# CONTINGENCY PLAN & EMERGENCY PROCEDURES

#### TITLE 22, SECTION 67126

### ARRANGEMENTS WITH LOCAL AUTHORITIES

Electronic Chrome & Grinding has attempted to make the following arrangements, as appropriate, for the type of wastes handled at this facility and the potential need for services. Our Contingency Plan contains the appropriate information required, to familiarize the Norwalk Sheriff Station with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes. These areas have been covered within the contents of this Contingency Plan.

#### This Plan specifically covers:

Company Name:

Electronic Chrome & Grinding Co.

Street:

9128-32 Dice Road

City/State/Zip:

Santa Fe Springs, CA 90670

Emergency Coordinator:

Mike Reed

Telephone No.:

BUS.: 310-946-6671

RES.:

FX-6: Personal Privacy

Received on behalf of:

Norwalk Sheriff Station 12335 Civic Center Drive

Norwalk, CA 90650

Norwalk, CA 90650 Telephone No.: (310) 863-8711

Received By

Dated: 3 127192

Printed Signature:

y Kn DERSON

### CONTINGENCY PLAN **EMERGENCY PROCEDURES**

#### TITLE 22, SECTION 67126

#### ARRANGEMENTS WITH LOCAL AUTHORITIES

Electronic Chrome & Grinding has attempted to make the following arrangements, as appropriate, for the type of wastes handled at this facility and the potential need for services. Our Contingency Plan contains the appropriate information required, to familiarize the Slauson-Sorenson Medical Clinic with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes. These areas have been covered within the contents of this Contingency Plan.

This Plan specifically covers:

Company Name:

Electronic Chrome & Grinding Co.

Street:

9128-32 Dice Road

City/State/Zip:

Santa Fe Springs, CA 90670

**Emergency Coordinator:** 

Mike Reed

Telephone No.:

BUS. 310-946-6671

**RES** FX-6: Personal Privacy

Received on behalf of:

Presbyterian Inter-Community Hospital

12401 E. Washington Blvd.

Whittier, CA 90606

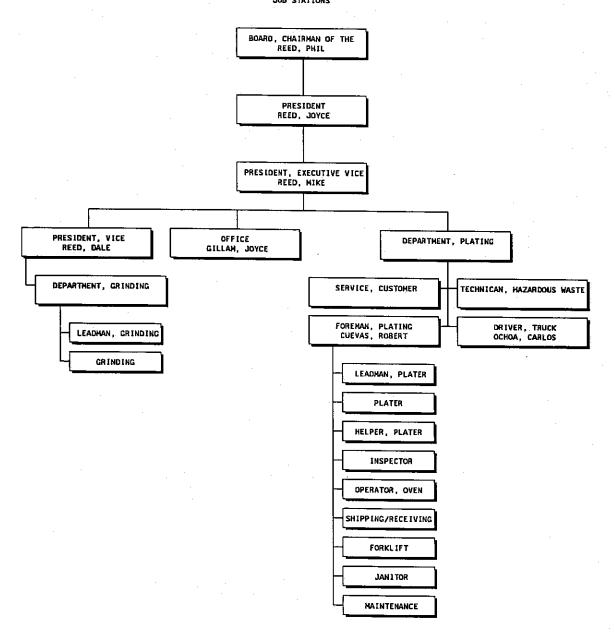
Telephone No.: (310) 698-0811

Received By: Ataly H. Ly mp. Dated: 3 127/92

Printed Signature: Stayley H. Singer, mp.

#### ELECTRONIC CHROME COMPANY

INJURY & ILLNESS PREVENTION PROCAM
JOB STATIONS



# CONTINGENCY PLAN TRAINING PROGRAM

ELECTRONIC CHROME & GRINDING CO., INC.

9128-32 DICE ROAD SANTA FE SPRINGS, CA 90670

(562) 946-6671

PREPARED BY
BAB-CAN CONSULTING, P.O. BOX 7081, CITY OF INDUSTRY, CA 91744
714-594-0500

# CONTINGENCY PLAN & EMERGENCY PROCEDURES

#### **TITLE 22, SECTION 67126**

#### ARRANGEMENTS WITH LOCAL AUTHORITIES

Electronic Chrome & Grinding has attempted to make the following arrangements, as appropriate, for the type of wastes handled at this facility and the potential need for services. Our Contingency Plan contains the appropriate information required, to familiarize California Chemical Disposal with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes. These areas have been covered within the contents of this Contingency Plan.

Company Name:	Electronic Chrome & Grinding Co
Street:	9128-32 Dice Road
City/State/Zip:	Santa Fe Springs, CA 90670
Emergency Coordinator:	Mike Reed
Telephone No.:	<b>BUS.</b> (562) 946–6671 <b>RES.</b> FX-6: Personal Privacy
Received on behalf of:	California Chemical Disposal 1815 East O Street Wilmington, CA 90744 Telephone No.: (213) 834-8077
Received By:	<b>Dated</b> :

# CONTINGENCY PLAN & EMERGENCY PROCEDURES

FOR

# **ELECTRONIC CHROME & GRINDING CO. INC.**

9128-32 DICE RD.

SANTA FE SPRINGS, CA 90670

(562) 946-6671

**JANUARY 1, 1999** 

CALIFORNIA CODE OF REGULATIONS
TITLE 22
DIVISION 4.5
CHAPTER 15
ARTICLES 3 & 4, and
SECTION 66265.16

PREPARED BY
BAB-CAN CONSULTING, P.O. BOX 7081, CITY OF INDUSTRY, CA 91744
714-594-0500

# CONTINGENCY PLAN & EMERGENCY PROCEDURES

#### TITLE 22, SECTION 67126

### ARRANGEMENTS WITH LOCAL AUTHORITIES

Electronic Chrome & Grinding has attempted to make the following arrangements, as appropriate, for the type of wastes handled at this facility and the potential need for services. Our Contingency Plan contains the appropriate information required, to familiarize the City of Santa Fe Springs Fire Department with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes. These areas have been covered within the contents of this Contingency Plan.

Company Name:	<b>718</b>
Cosupany Name:	Electronic Chrome & Grinding Co.
Street:	9128-32 Dice Road
City/State/Zip:	Santa Fe Springs, CA 90670
Emergency Coordinator:	Mike Reed
Telephone No.:	RES. (562) 946–6671 RES. FX-6: Personal Privacy
Received on behalf of:	City of Santa Fe Springs Fire Depar 11300 Greenstone Avenue Santa Fe Springs, CA 90670
	<b>Telephone No.:</b> (562) 944-971:
	2

#### SECTION 1. FACILITY DESCRIPTION

Type of Facility:

Hard Chrome Plating & Grinding Facility

EPA ID. Number:

CAD 008-391-427

Address:

9128-32 Dice Road

Santa Fe Springs, CA 90670

Location:

North of Los Nietos Rd. and South of Slauson Avenue

Thomas Guide Page Number - 706,

Intersection of J and 2.5

County:

Los Angeles

Telephone Number:

Fax Number:

(562) 946-6671 (562) 946-5903

Owner/Operator:

Philip W. Reed

Mailing Address:

9128-32 Dice Road

Santa Fe Springs, CA 90670

Contact:

Mike Reed

**Business Telephone #:** 

(562) 946-6671

Residence Address:

FX-6: Personal Privacy

Residence Telephone #:

# Electronic Chrome & Grinding Co. is located at: 9128-32 Dice Rd. Santa Fe Springs, CA 90670

From the 605, San Gabriel River Freeway exit at Slauson Ave. and turn right (South) onto Pioneer and proceed to Slauson Ave. turn left (East) on Slauson Ave. and proceed approximately one mile to Dice Rd. turn right (South) onto Dice Rd. and proceed across railroad tracks approximately 3/4 of a mile. Our facility is on the left (east) side of the street just north of Los Nietos Road.

# SECTION 3. EMERGENCY COORDINATORS AND RESPONSE PROCEDURES

The following is a listing of personnel designated as having authority to assume supervisory responsibility in the event of a spill or other contingency. Phone numbers are listed so that they may be contacted at any time their services are required for this function.

Details of the responsibilities to be assumed by the Emergency Coordinator are presented below and the procedures to be implemented for response are outlined in Section 3.6 (Incident Response - Release of Hazardous Waste, Fire or Explosions).

Emergency Cordinators

Primary

Home Address:

Mile Reed FX-6: Personal Privacy

Second Alternate:

Home Address:

Dale Reed

FX-6: Personal Privacy

Residence Phone No.

FX-6: Personal Privacy

Third Alternate:

Home Address:

Luciano Gonzalez

FX-6: Personal Privacy

Facility Owner:

Home Address:

Philip W. Reed

FX-6: Personal Privacy

### RESPONSIBILITIES OF EMERGENCY COORDINATOR

The Emergency Coordinator (EC) is responsible for coordinating all emergency response measures and as such has the authority to commit the resources needed to carry out this Contingency Plan.

Personnel qualified to act as an EC are on the premises or on call and capable of quick arrival at all times. The EC is thoroughly familiar with:

- All aspects of this contingency plan;
- · All operations and activities at the facility;
- Location and characteristics of wastes handled;
- · Location of all records within the facility, and
- Facility layout.

In the event that the Primary Emergency Coordinator is not present at the plant when an incident occurs requiring action, the next designated person on the list who is present at the facility will assume responsibility for immediate response activities. In any event, one or more of the Emergency Coordinators must be present at the facility or on call during any part of the day. The Emergency Response Coordinator acting at the facility will have responsibility for summoning personnel and outside contractors, which may be necessary to respond to the incident, will contact emergency response personnel who may be needed to

# SECTION 4. OUTSIDE NOTIFICATION AND COORDINATION AGREEMENTS

ELECTRONIC CHROME & GRINDING CO. has agreements with local authorities to provide assistance in the event of an emergency. A list of primary local authorities which may provide assistance is presented below:

# 4.1 LOCAL AUTHORITIES PROVIDING EMERGENCY ASSISTANCE TO ELECTRONIC CHROME & GRINDING CO.

AGENCIES	<u>T</u> 6	elephone Number:
* Fire Response: City of Santa Fe Springs Fire Department 11300 Greenstone Avenue Santa Fe Springs, CA 90670	(562)	<b>911</b> 944-9713
* Paramedics:		911
* Police Response:	(562)	911 868-1711
* Hospitals and Clinics: Slauson-Sorenson Medical Clinic 11823 E. Slauson Ave., Suite 40 Santa Fe Springs, CA 90670	(562)	696-1161
Presbyterian Inter-Community Hospital 12401 E. Washington Blvd. Whittier, CA 90606	(562)	698-0811
* County of Los Angeles Fire Department Fire Prevention, Preparedness and Conservation Hazardous Materials Control Program 2615 South Grand Avenue Los Angeles, CA 90007-2668	n Bureau	(213) 744-5316
* California Chemical Disposal 1815 East O Street Wilmington, CA 90744		(213) 834-8077 (800) 828-4455

# 9.1 EMERGENCY EVENT REPORTING FORM (ON SITE)

ELECTRONIC CHROME & GRINDING CO.	E	EPA ID #: CAD 008 391 427
9128-32 Dice Road		
Santa Fe Springs, CA 90670		
Name and telephone number of person reporting:  Time/Date of incident:  Type of incident:		
Type of incident:  Material(s) Involved and Quantity:		
Extent of injuries:		
The release will affect human health or the environment If YES, describe:	:YES_	
Corrective action taken to contain release:		
Estimated quantity and disposal of recovered material fi	rom inci	dent:
LOCAL AUTHORITIES PROVIDING EMERGENCY ASSIST	TANCE (	(SECTION 4.1)
Fire Department	911	
Paramedics	911	
Police Department	911	(562) <b>863-8711</b>
Office of Emergency Services		(800) 852-7550
	•	(916) 427-4341
HOSPITALS AND MEDICAL CLINICS:		(======================================
Slauson-Sorenson Medical Clinic		696-1161
Presbyterian Inter-Community Hospital		698-0811
		the same
State California Environmental Protection Agen	cy	
Dept. of Toxic Substance Control Program -I	Region 3	8 (818) 567-3000
County of Los Angeles Fire Department Fire Pro	evention	1
Preparedness and Conservation Bureau		•
I TOUR TOUR TOUR TOUR TOUR TOUR TOUR TOUR		(213) 744_5316
		(213) 744-5316
California Chemical Disposal		(213) 744-5316 (213) 834-8077

# 9.2 EMERGENCY EVENT REPORTING FORM (OFF SITE)

ELECTRONIC CHROME & GRINDING CO. 9128-32 Dice Road, Santa Fe Springs, CA 90670	EPA ID#: CAD 008 391 427
5120 52 Dico Road, Banda Te Springs, CA 90070	
Name and telephone number of person reporting:  Time/Date of incident:	
Type of incident:	
waterial(s) involved and Quantity:	
Extent of injuries:  The release will affect human health or the environment:	
The release will affect human health or the environment:	YES NO
II I E5, describe:	
Corrective action taken to contain release:	
Estimated quantity and disposal of recovered material from	om incident:
Hazardous Waste Manifest No.:	(if applicable)
CALL AGENCIES BELOW (TABLE 4.2):	Telephone Number
California Environmental Protection Agency (Re	gion 3)
Dept. of Toxic Substances Control	- ·
1405 N. San Fernando Blvd., Burbank, CA 9150	)4 (818) 567-3000
County of Los Angeles Fire Department,	
Fire Prevention, Preparedness and Conservation I	Bureau
Hazardous Materials Control Program	
2615 South Grand Avenue, Los Angeles, CA 900	007-2668 (213) 744-5316
U.S. EPA, Toxic Spills Division T-3-3	
215 Fremont Street, San Francisco, CA 94105	(415) 974-8131
Regional Water Quality Control Board	
101 Centre Plaza Drive, Monterey Park, CA 917	754-2156 (213) 266-7500
EMERGENCY RESPONSE	911
OFFICE OF EMERGENCY SERVICES	2
CITIED OF DIMENSING I BERCAICES	(800) 852-7550 or (916) 427-4341
NATIONAL RESPONSE CENTER	(800) 424-8802
Department of Transportation	
-	(202) 426-1830
California Chemical Disposal	(213) 834-8077 or (800) 828-4455

# FORM 11.1 CONTINGENCY PLAN MANUAL DISTRIBUTION

DATE PRESENTED	. <u>#</u>	
OR MAILED	RECEIVED BY (NAME)	FACILITY NAME & ADDRESS
<u> </u>		City of Santa Fe Springs Fire Dept. 11300 Greenstone Avenue Santa Fe Springs, CA 90670
		No. 11 of tong
		Norwalk Sheriff Station 12335 Civic Center Drive Norwalk, CA 90650
		Slauson-Sorenson Medical Clinic 11823 E. Slauson Ave., Unit 40 Santa Fe Springs, CA 90670
		Presbyterian Inter-Community Hospital 12401 E. Washington Blvd. Whittier, CA 90606
		County of Los Angeles Fire Dept. Fire Prevention, Preparedness and Conservation Bureau 2615 South Grand Ave. Los Angeles, CA 90007-2668
		California Chemical Disposal 1815 East O Street Wilmington, CA 90744

#### Electronic Chrome & Grinding Co. Hazardous Waste Generator Training 15 March 2006

Training Performed by:

ESCI EnviroServices, Inc.

Steve Lichten

Ismael Pedroza

**Training Methodology:** 

Instructor-led, field-based.

# Training Outline (Topical): Hazardous Waste Generator Personnel

#### I. Types of Wastes Generated

Type	Hazards	Handling Precautions
Chromium-containing grinding sludge	Toxic by inhalation  Toxic by ingestion	<ul> <li>If dust is possible, wear dust masks/respirators</li> <li>Rubber/latex gloves</li> <li>Safety glasses (goggles if</li> </ul>
Floor sweepings from grinding room operations	Irritating by skin contact	<ul> <li>splashing is possible)</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
Spent hydrochloric/muriatic acid with chromium residuals (pre-treatment)	Toxic by inhalation  Toxic by ingestion  Corrosive by skin contact  Eye contact hazard	<ul> <li>Rubber gloves and apron</li> <li>Sleeve protection if arm contact possible</li> <li>Safety glasses (goggles if splashing is possible)</li> <li>Eyewash in immediate area</li> <li>Do not put into a metal container</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
Neutralized chromium- containing filter cake from waste acid treatment	Toxic by inhalation  Toxic by ingestion  Irritating by skin contact	<ul> <li>If dust is possible, wear dust masks/respirators</li> <li>Rubber/latex gloves</li> <li>Safety glasses</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
Used lubricating and hydraulic oils	Irritating by skin contact	<ul> <li>Latex gloves if much contact</li> <li>Safety glasses</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>

Type	Hazards	Handling Precautions     Latex gloves if much contact
Spent oily clean up sorbents	Irritating by skin contact	<ul> <li>Safety glasses</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
	Toxic by inhalation	<ul> <li>If dust is possible, wear dust masks/respirators</li> <li>Rubber gloves and apron</li> </ul>
Spent acid or chromium containing clean up sorbents	Toxic by ingestion  Corrosive or irritating by	<ul> <li>Sleeve protection if arm contact possible</li> <li>Safety glasses (goggles if</li> </ul>
	Eye contact hazard	<ul> <li>splashing is possible)</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>

☐ For any unknown or unidentified or unlabeled waste: Contact Ed or Mike if there is any question or doubt regarding what the waste is and how to handle it

i. Unknowns should be identified as soon as possible and labeled correctly.

#### II. Waste Compatibility

Some	wastes	can	NOT	be	mixed	together	in	the	same	container.	Some
waste	containe	ers ca	an not	be	stored	together:					

	Acid	wastes	must	not	be	mixed	with	anything	else.
--	------	--------	------	-----	----	-------	------	----------	-------

- Acid wastes can not be placed in a metal container. A poly or strong plastic container must be used.
- ☐ Acid waste containers should be stored in their own containment pallet with no other material or waste.
  - i. An eyewash should be in the area of waste acid handling
- ☐ Used oils and hydraulic fluids should not be mixed with anything else

#### III. Waste Container Labeling

	ΑII	hazaı	rdous	wa	iste (	cont	ain	ers (d	Irun	ns, k	ooxes	, and	ba	os) a	nd	the	used
	Oil	tank	must	be	labe	led	as	soon	as	the	first	piece	or	drop	of	was	ite is
	-pla	iced in	iside.			· ·						·					
_					_		_										

- ☐ Labels must be clearly and neatly written
- ☐ Labels must be visible (not hidden)
- ☐ Labels must have:
  - i. Generator (company) name, address & phone number
  - ii. Description of the waste (contents & composition)

- iii. Physical state
- iv. Hazards
- v. EPA ID number (CAD008391427)
- vi. Accumulation start date (the date waste was <u>first</u> placed in the container)
- ☐ Ed or Mike may provide pre-completed labels for the different hazardous wastes. But the person first generating the waste and placing it in the container must 1) label the correct container, and 2) write the accumulation start date on the label.
- ☐ The EPA and Calif. Waste numbers and manifest document number will be marked by Ed or Mike when the waste is picked up for disposal.

: HAZAGDOUS:
STATE AND FEDERAL LAW PROPERT MPROPER DISPOSAL.
PASINA CONTROL RESPONDENT OF EDGO ELEGRATED CONTROL  OF THE CALIFORNIA OFFICE MENT OF EDGO ELEGRATED CONTROL  GENERAL REPORTS OF EDGO ELEGRATED CONTROL  G
CONT.
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Contents College Colle
CAMPACATION CONSIDER CAMPACATION CONTROL CONTR
HANDLE WITH CARE!

#### IV. Waste Container Handling & Management

Containers (drums, boxes, and bags) holding hazardous waste must be:

- ☐ In good condition: No sharp dents or damage and no major rusting
- Clean of residues and not leaking

*		reptituity closed at all times — except when actually putting waste inside.
		i. Drum bungs screwed in
		ii. Drum lids placed on and the lid ring fully set and hand tightened
		iii. Funnels (if used) closed and latched
		iv. Proper box lid on waste boxes
		v. Bags tightly sealed
		Handled safely:
		<ul> <li>Moved using a drum dolly, or on a pallet using a forklift or hand cart, etc.</li> </ul>
		<li>ii. Stored away from operating machinery and equipment</li>
		iii. Stored out of the aisles or exit routes
		iv. Plastic lining in sludge boxes
		Liquid containing drums should be placed in containment pallets
		opaning periodic serial increase of containing
		Spill residues must be promptly and completely cleaned up
		i. Spill residues and clean up materials are also a hazardous waste
		Waste containers should be protected from the rain
		i. Kept inside, or
		<li>ii. Containment pallets and cardboard boxes covered with a tarp or plastic sheet <u>before</u> the rain arrives</li>
		Wastes must be disposed of within 90 days after accumulation start date
		i. Should have wastes picked up every 60 – 75 days
V.	Wast	e Tank Management
	Ta be	nks (waste oil tank, waste treatment tanks) holding hazardous waste must
		In good condition: No sharp dents or damage and no major rusting
		In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking
	<u> </u>	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times – except when actually putting waste inside.
	<u> </u>	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times – except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals
	0	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times — except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times  i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals  ii. Spill residues and clean up materials are also a hazardous waste
	0	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times – except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times  i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals  ii. Spill residues and clean up materials are also a hazardous waste Wastes must be disposed of within 90 days after accumulation start date
	0	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times — except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times  i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals  ii. Spill residues and clean up materials are also a hazardous waste
VI.	0	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times – except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times  i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals  ii. Spill residues and clean up materials are also a hazardous waste Wastes must be disposed of within 90 days after accumulation start date
VI.	0	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times — except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times  i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals  ii. Spill residues and clean up materials are also a hazardous waste Wastes must be disposed of within 90 days after accumulation start date  i. Should have wastes picked up every 60 – 75 days
VI.	Emer	In good condition: No sharp dents or damage and no major rusting Clean of residues and not leaking Kept fully closed or covered at all times — except when actually putting waste inside.  Secondary containment must be kept clean and free of wastes at all times  i. All spills, leaks or residues must be promptly removed and containment area cleaned of residuals  ii. Spill residues and clean up materials are also a hazardous waste Wastes must be disposed of within 90 days after accumulation start date  i. Should have wastes picked up every 60 — 75 days  gency Containment Pit for Chrome Tanks  The pit is for emergency containment only: It must be kept clean, dry and

out the pit
ii. Do NOT enter the pit: it is a hazardous confined space.

#### VII. Spills and Other Emergencies

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<u>Emergency</u>	-uuuuuuu	1
	<u> </u>	٠.

□ Fire extinguishers □ Spill clean up absorbents, pads, etc. □ Emergency eyewash station(s) □ Gloves, goggles, aprons □ Phones or alarms (or alarm horns) □ Let Ed or Mike know immediately if any need to be replaced or repaired  Small leaks or spills □ If the spill, leak or amount of residue is:  i. Small in volume/amount, and ii. Not still leaking out, and iii. A material you normally handle, and iv. Can be cleaned up by you or others in the immediate area, and v. And is not a significant safety or health hazard:  Clean up: □ Use spill absorbents or sorbent pads/socks (if liquid)  a. Used clean up material has the same hazards as the material spilled  b. Do not walk into or through the spilled material to place sorbents  c. Clean up completely and remove all sorbent materials  d. Wear gloves, safety glasses and apron (if needed) □ Sweep and dust pan collection if solid  a. Used clean up material has the same hazards as the material spilled  b. Clean up completely and remove all residues c. Wear gloves, safety glasses and (if dusting) a respirator.or.dust mask □ Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled. □ Tell Ed or Mike immediately if any material or residue goes	Be aware of the location of the following, and make sure they are in good condition and not being blocked by anything:
Small leaks or spills  ☐ If the spill, leak or amount of residue is:  i. Small in volume/amount, and ii. Not still leaking out, and iii. A material you normally handle, and iv. Can be cleaned up by you or others in the immediate area, and v. And is not a significant safety or health hazard:  Clean up:  ☐ Use spill absorbents or sorbent pads/socks (if liquid)  a. Used clean up material has the same hazards as the material spilled  b. Do not walk into or through the spilled material to place sorbents  c. Clean up completely and remove all sorbent materials  d. Wear gloves, safety glasses and apron (if needed)  ☐ Sweep and dust pan collection if solid  a. Used clean up material has the same hazards as the material spilled  b. Clean up completely and remove all residues c. Wear gloves, safety glasses and (if dusting) a respirator or dust mask  ☐ Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled.	<ul> <li>□ Spill clean up absorbents, pads, etc.</li> <li>□ Emergency eyewash station(s)</li> <li>□ Gloves, goggles, aprons</li> </ul>
☐ If the spill, leak or amount of residue is:  i. Small in volume/amount, and  ii. Not still leaking out, and  iii. A material you normally handle, and  iv. Can be cleaned up by you or others in the immediate area, and  v. And is not a significant safety or health hazard:  Clean up:  ☐ Use spill absorbents or sorbent pads/socks (if liquid)  a. Used clean up material has the same hazards as the material spilled  b. Do not walk into or through the spilled material to place sorbents  c. Clean up completely and remove all sorbent materials  d. Wear gloves, safety glasses and apron (if needed)  ☐ Sweep and dust pan collection if solid  a. Used clean up material has the same hazards as the material spilled  b. Clean up completely and remove all residues  c. Wear gloves, safety glasses and (if dusting) a respirator_or_dust mask  ☐ Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled.	☐ Let Ed or Mike know immediately if any need to be replaced or repaired
<ul> <li>i. Small in volume/amount, and</li> <li>ii. Not still leaking out, and</li> <li>iii. A material you normally handle, and</li> <li>iv. Can be cleaned up by you or others in the immediate area, and</li> <li>v. And is not a significant safety or health hazard:</li> <li>Clean up:  Use spill absorbents or sorbent pads/socks (if liquid)  a. Used clean up material has the same hazards as the material spilled  b. Do not walk into or through the spilled material to place sorbents  c. Clean up completely and remove all sorbent materials  d. Wear gloves, safety glasses and apron (if needed)</li> <li>Sweep and dust pan collection if solid  a. Used clean up material has the same hazards as the material spilled  b. Clean up completely and remove all residues  c. Wear gloves, safety glasses and (if dusting) a respirator or dust mask</li> <li>Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled.</li> </ul>	Small leaks or spills
<ul> <li>□ Use spill absorbents or sorbent pads/socks (if liquid)         <ul> <li>a. Used clean up material has the same hazards as the material spilled</li> <li>b. Do not walk into or through the spilled material to place sorbents</li> <li>c. Clean up completely and remove all sorbent materials</li> <li>d. Wear gloves, safety glasses and apron (if needed)</li> </ul> </li> <li>□ Sweep and dust pan collection if solid         <ul> <li>a. Used clean up material has the same hazards as the material spilled</li> <li>b. Clean up completely and remove all residues</li> <li>c. Wear gloves, safety glasses and (if dusting) a respirator or dust mask</li> </ul> </li> <li>□ Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled.</li> </ul>	<ul> <li>i. Small in volume/amount, and</li> <li>ii. Not still leaking out, and</li> <li>iii. A material you normally handle, and</li> <li>iv. Can be cleaned up by you or others in the immediate area, and</li> </ul>
outside the building, off the property or into a drain.	<ul> <li>□ Use spill absorbents or sorbent pads/socks (if liquid)         <ul> <li>a. Used clean up material has the same hazards as the material spilled</li> <li>b. Do not walk into or through the spilled material to place sorbents</li> <li>c. Clean up completely and remove all sorbent materials</li> <li>d. Wear gloves, safety glasses and apron (if needed)</li> </ul> </li> <li>□ Sweep and dust pan collection if solid         <ul> <li>a. Used clean up material has the same hazards as the material spilled</li> <li>b. Clean up completely and remove all residues</li> <li>c. Wear gloves, safety glasses and (if dusting) a respirator or dust mask</li> </ul> </li> <li>□ Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled.</li> <li>□ Tell Ed or Mike immediately if any material or residue goes</li> </ul>

#### Larger leaks or spills

or in any 'en	nk or amount of residue is more than you can handle safely, nergency' situation (tank rupture, acid spill, fume or gas arge container leak):	
	Get out of the immediate area and make sure others	
	a. Can take protective measures (shut of flow to tank or system if it can be done safely)	
	Sound the emergency alarm and/or immediately notify Ed or Mike	
	Keep people out of the area	
	Do not attempt clean up	
	Evacuate entire facility if the emergency is big enough.	
	<ul> <li>Evacuate to the front of the facility along the sidewalk.</li> </ul>	
	b. Stay upwind	
	c. Make sure everyone got out safely.	
	Ed or Mike will call the Fire Department for emergency assistance	
	<ol> <li>May call 9-1-1 if anyone is injured or exposed.</li> </ol>	

### Training Outline (Topical): Hazardous Waste Management Personnel

I.	Waste Storage Area Inspections - Containers
	<ul> <li>□ All hazardous waste storage areas must be inspected on a weekly basis and a log of the inspections kept.</li> <li>□ Any employee can perform the inspections, but must be trained.</li> <li>□ Any problems found must be corrected as soon as possible, and the inspection form should indicate the corrective action.</li> <li>□ Completed inspection forms must be kept on file for three years.</li> <li>□ Items to inspect (see inspection form) include:         <ol> <li>i. Labeling of containers</li> <li>ii. Condition of containers (closed, in good condition, no significant residue)</li> <li>iii. Containers stored safely and properly (protected from weather, etc.)</li> <li>iv. Acids segregated from other wastes</li> <li>v. No spill or leak residues</li> </ol> </li> </ul>
	<ul> <li>vi. Emergency equipment available and in good condition</li> <li>vii. Storage times within the 90 day limit (from the accumulation start date)</li> </ul>
<i>II.</i>	Waste Storage Area Inspections – Tanks (including the waste treatment area)  All hazardous waste tanks and the waste treatment area must be inspected on a daily basis and a log of the inspections kept.  Any employee can perform the inspections, but must be trained.  Any problems found must be corrected as soon as possible, and the inspection form should indicate the corrective action.  Completed inspection forms must be kept on file for three years.  Items to inspect (see inspection form) include:  i. Labeling of tanks  ii. Condition of tanks and waste treatment containers (closed, in good condition, no significant residue)  iii. Waste treatment containers stored safely and properly  iv. Secondary containment in good condition (not cracked, etc.)  v. No spill or leak residues on tank, containers or in secondary containment  vi. Emergency equipment available and in good condition  vii. Storage times within the 90 day limit (from-the-accumulation start-date)
III.	Hazardous Waste Disposal Coordination and Records
	☐ Hazardous wastes must be removed for off-site treatment, storage or

i. i.e. within 3 months of the accumulation start date on the tank or container ii. should have waste pickups well before that date approaches All waste labels must be fully completed (with the hazardous waste) manifest number. EPA and Calif. Waste codes), and the container labeled with the appropriate DOT hazard labels. The disposal contractor may provide a completed hazardous waste manifest, but it still must be reviewed for accuracy and completeness before signing i. A new manifest form is required after Sept. 5, 2006 (and may be in use now). ☐ The DTSC copy of the manifest must be mailed to DTSC within 30 days of the shipment/pickup (see instructions on the manifest) The 'generator retains' copy of the manifest should be kept on file ☐ The treatment, storage or disposal facility must send you a signed copy (with their signature on it) within 30 days of the waste shipment/pickup i. Match it with the signed copy you filed from when it was first picked up ii. Make sure there are no changes iii. Staple the two copies together iv. Keep them on file for at least three years (suggest you file them in chronological order) ☐ If you do NOT get the signed copy back within 30 days, call the vendor and disposal facility ASAP to get your signed copy. If a copy is not received within 45 days total, you must notify the Fire Department and the State. Obtain copies of all hazardous waste profiles or approvals from the disposal vendor and keep them on file for three years. Other Hazardous Waste Records The following hazardous waste related records should be kept on file for three years: Training records ☐ Hazardous waste manifests ☐ Hazardous waste identification/testing documents or waste profiles Operating instructions for the waste treatment system. ☐ Air quality/permitting records ☐ Records of emergency equipment testing or maintenance ☐ Any records of any repairs or maintenance to waste tanks or treatment systems Hazardous waste biennial report (covers every odd numbered year, and must be submitted by March 1 of every even numbered year) ☐ Hazardous Waste Manifest Verification Questionnaire and Fee payments (must be submitted to DTSC annually - arrives approx. May to June) ☐ Hazardous waste disposal taxes (must be paid to State Board of Equalization – arrives approx. May to June)

IV.

disposal within 90 days of the waste first being generated

	<ul> <li>Santa Fe Springs Fire Department CUPA permit and record of fees paid.</li> <li>Hazardous wastes must be removed for off-site treatment, storage or disposal within 90 days of the waste first being generated</li> </ul>
	Spill and Release Reporting
-	In the event a spill or leak or other release of hazardous materials or wastes meets any of the following conditions, it must be immediately reported (reporting instructions follow):
	<ul> <li>☐ Substantial hazard to:         <ol> <li>i. Health</li> <li>ii. Safety</li> <li>iii. Property, or</li> <li>iv. The environment</li> </ol> </li> <li>☐ Can not be cleaned up by employees in the immediate work area and poses a potential safety or health hazard to clean up employees</li> <li>☐ Leaves the property (including publicly accessible areas like the front parking lot) or enters any storm drain or sewer drain</li> <li>☐ Anyone is hurt, injured or exposed to chemicals</li> <li>Reporting must be made immediately upon determining that any of the above conditions exist (and that determination must be done quickly). Notify:</li> <li>☐ Santa Fe Springs Fire Department (562-946-3800)</li> <li>☐ 9-1-1 (if an emergency exists)</li> <li>☐ Calif. Office of Emergency Services (800-852-7550)</li> </ul>

V.

# ELECTRONIC CHROME AND GRINDING CO., INC.

Training Course/Topic: Large Quantity Hazardous Waste Generator  Course Date: March 15, 2006 Revision Number: 1  Instructor: Steve Lichten & Ismael Pedroza; ESCI EnviroServices, Inc. Page: 1 of /  Topics Covered:  Hazardous Waste Identification and Hazards Proper Labeling of Waste Proper Container Management, Accumulation & Storage Storage Area Inspections and Corrective Action Hazardous Waste Spills & Clean Up Thergency Equipment  Instructors Signature:	Environmental Training Attendance Record			
Course Date: March 15, 2006 Revision Number: 1  Instructor: Steve Lichten & Ismael Pedroza; ESCI EnviroServices, Inc. Page: 1 of /  Topics Covered:  Hazardous Waste Identification and Hazards Proper Labeling of Waste Proper Container Management, Accumulation & Storage Storage Area Inspections and Corrective Action Hazardous Waste Spills & Clean Up  Thergency Equipment	Training Course/Topic: Large Quantity	Hazardous Waste Generator		
Topics Covered:  Hazardous Waste Identification and Hazards Proper Labeling of Waste Proper Container Management, Accumulation & Storage Storage Area Inspections and Corrective Action Hazardous Waste Spills & Clean Up Finergency Equipment	Course Date: March 15, 2006	Revision Number: 1		
Topics Covered:  Hazardous Waste Identification and Hazards Proper Labeling of Waste Proper Container Management, Accumulation & Storage Storage Area Inspections and Corrective Action Hazardous Waste Spills & Clean Up Finergency Equipment	Instructor: Steve Lichten & Ismael Pedroza;	ESCI EnviroServices, Inc.   Page: 1 of /		
Proper Labeling of Waste Proper Container Management, Accumulation & Storage Storage Area Inspections and Corrective Action Hazardous Waste Spills & Clean Up Friergency Equipment	Topics Covered:			

<u>Printed</u> Name (first, last)	Signature	Job Title
Jorge Chiman Canter	(I dimin	Buffer HW
SAlucdor Le anosto	Schador Lecões Flores	Buffer HW
Melecio Robles	melio Rales	SET UP PLATER
Anastacio Robies	Anas Tacio Robles	Buffer HW
RUBEN GONZALEZ	Ruben Sandles	Buffer HW
Leonel martinez	Leoner markaez	SET UP PLATER
ED KRUCK	Ed Kruck	Supervisor

# ELECTRONIC CHROME AND GRINDING CO., INC.

Environmental Training Attendance Record				
Training Course/Topic: Large Quantity	Hazardous Waste Gen	erator Manager		
Course Date: March 17, 2006	Revision Number: 1			
Instructor: Steve Lichten; ESCI EnviroService	es, Inc.	Page: 1 of /		
Topics Covered:				
<ul> <li>Hazardous Waste Ma</li> </ul>				
<ul> <li>Storage Area Inspections and Corrective Action</li> </ul>				
<ul><li>Recordkeeping</li></ul>				
<ul> <li>Spill and release reporting /</li> </ul>				
Make-up training				
Instructor Signature:				
The state of the s				

Printed Name (first, last)	Signature	Job Title
ED KRUCK Mike Reed	El Kruck Mile Reed	shop Supervisor
Mike Reed	Mile Read	shop Supervisor VP/G·m.

# ELECTRONIC CHROME AND GRINDING CO., INC.

### Hazardous Waste Training Program: 2006

# 1. Employees with Hazardous Waste Management Duties

Job Title	Hazardous Waste – Related Duties	Name
Buffer HW	<ul> <li>Identify wastes which are hazardous (e.g. buffer dust, acid/chrome stripping waste)</li> <li>Sweep up and containerize buffing dust</li> <li>Assure hazardous waste containers are labeled</li> <li>Assure hazardous waste containers are managed properly</li> <li>Notify shop supervisor in event of problems or emergencies</li> <li>Clean up small, low hazard spills</li> </ul>	<ul> <li>▶ Jorge Cantor</li> <li>▶ Salvador Flores</li> <li>▶ Ruben Gonzalez</li> <li>▶ Anastacio Robles</li> </ul>
Set up Plater	<ul> <li>Identify wastes which are hazardous (e.g. acid/chrome stripping waste, chrome sludge, buffer dust)</li> <li>Operate acid/chrome waste treatment unit</li> <li>Containerize chrome treatment sludge</li> <li>Assure hazardous waste containers are labeled</li> <li>Assure hazardous waste containers are managed properly</li> <li>Check eyewash/shower for proper operation</li> <li>Notify shop supervisor in event of problems or emergencies</li> <li>Clean up small, low hazard spills</li> </ul>	➤ Leonel Martinez ➤ Melecio Robles
Shop Supervisor	<ul> <li>Prepare/coordinate preparation of hazardous waste labels, hazardous waste manifests and other recordkeeping</li> <li>Oversee hazardous waste generating activities of shop personnel</li> <li>Oversee acid/chrome waste treatment unit</li> <li>Conduct weekly and daily inspections</li> <li>Coordinate with commercial disposal/treatment vendor</li> </ul>	➤ Ed Kruck

#### 2. Type and Amount of Hazardous Waste Management Training

### Initial Training: All employees with hazardous waste management duties

Training Methodology:

Instructor led, field-based.

Determination of Training Effectiveness:

Iterative evaluation during

training, verified through weekly inspections.

Training Instructors:

ESCI EnviroServices, Inc. (Steven Lichten-

primary; Ismael Pedroza-interpreter). Qualifications summary attached.

Training Topics:

Types and hazards of wastes generated;

Safe waste handling and precautions;

· Labeling or containers and tanks;

Waste container & tank management requirements;

Segregation and storage of wastes;

Managing small spills;

Basic emergency equipment use; and

Basic emergency procedures.

Training Time:

Approx. 1 hour

Training Materials:

See attached March 2006 outline.

#### Initial Training: Supervisory employees with hazardous waste management

Training Methodology:

Instructor led, field-based.

Determination of Training Effectiveness:

Iterative evaluation during

training.

Training Instructors:

ESCI EnviroServices, Inc. (Steven Lichten).

Qualifications summary attached.

Training Topics:

Weekly hazardous waste storage area inspections;

Daily used oil tank and acid treatment tank inspections;

Hazardous waste manifesting requirements;

Recordkeeping and required state reporting;

Spill/release reporting requirements; and

Conducting make-up training.

Training Time:

Approx. 30 minutes

Training Materials:

See attached March 2006 outline.

<u>Annual Refresher Training:</u> All employees with hazardous waste management duties and supervisory employees

Annual training review is anticipated to be generally consistent with the initial training provided and described above. Trainer(s) will review the prior year hazardous waste weekly and daily inspection records in order to highlight issues needing improvement or good management practices.

<u>Make-up Training:</u> Any employee not able to attend initial/annual training or employees subsequently assigned hazardous waste management duties.

Make up training will be conducted by the shop supervisor (trained as described above) consistent with this training program. Newly assigned employees will be trained within 6 months of initial assignment and will be directly supervised until trained.

#### 3. Hazardous Waste Management Training Documentation

Training Attendance: Sign in sheets (with name, titles, and training date).

# ESCI ENVIROSERVICES, INC.

4401 ATLANTIC AVENUE SUITE 200 LONG BEACH, CA 90807

PHONE: 562-984-2079 Fax: 562-984-2001

slichten@enviroservices.com

Steven M. Lichten has been working in the environmental field for nearly 25 years, including nearly nine years developing and managing the environmental, hazardous materials and regulatory affairs program at Hughes Aircraft Company's EDSG complex in El Segundo and two years as a Senior/Supervising Environmental Engineer and the Regional Regulatory Affairs Manager directing the Regulatory Compliance Services Group at McLaren-Hart's Irvine regional office. Steve next served three years as Chief Environmental Scientist in the Corporate Environmental Services Group at Hunt-Wesson, Inc. with responsibility for environmental, regulatory, and environmental health risk management programs at 34 facilities. Steve is currently President of ESCI EnviroServices, Inc., an environmental and occupational health and safety consulting and compliance management firm based in Long Beach, California. He joined ESCI EnviroServices in 1993. Steve also teaches both university degree courses and extended education courses in environmental management and compliance, industrial safety, emergency response planning/management and other topics. He has taught for the past 21 years at UC Irvine, UC Los Angeles, CSU Northridge, CSU Long Beach, CSU Fullerton and other schools. Steve also teaches regulatory compliance and management seminars around the country and has been a certified instructor for the Department of Toxic Substances Control's California Compliance School. Steve has taught several courses for regulatory agency personnel at the past three and upcoming 2006 California CUPA Conferences.

Steve is past president of the Industrial Environmental Coalition of Orange County, and co-chairs the Program Committee. He is also a steering committee member of the Board of Environmental Auditor Certification (Southern California Section), and is active in several industry/agency working groups and advisory committees. Steve has served as the Emergency Planning Representative for the EPCRA Local Emergency Planning Committee (LEPC) Region I, formerly served as the educational representative on the USEPA/Orange County Water District Groundwater Guardian Program and was a steering committee member of the Board of Environmental Auditor Certification (Southern California Section).

Steve holds B.S. and M.S. degrees in Environmental and Occupational Health Science from California State University, Northridge, is a Certified Professional Environmental Auditor, and an SCAQMD Certified Permitting Professional.

ESCI EnviroServices, Inc. is a small full-service multi-disciplinary environmental and occupational health and safety consulting consortium home-based in Long Beach, California with clients and projects throughout southern, central and northern California and nationwide. ESCI EnviroServices personnel have exceptional hands-on industry, consulting, and regulatory agency experience, with most having 15 - 25 years in major industry. ESCI EnviroServices specializes in a broad range of multi-media environmental management and occupational health & safety program development and implementation services; EH&S compliance services; multi-agency regulatory permitting and agency coordination; environmental and health and safety compliance and management systems audits and program development; performance of property assessments; pollution prevention assessments and plan development; and integrated and customized environmental compliance and health and safety training course services. ESCI EnviroServices' client base includes private industrial and government operated manufacturing and commercial facilities; major electric and water utilities; commercial, industrial, service and research facilities; oil and gas exploration/production; military facilities; and federal, state and local regulatory and public agencies. ESCI EnviroServices is proud of our over 16 years of service to the regulated and regulating community.

Assisting Industry and Government to Achieve Competitive Environmental and Economic Advantage

#### Electronic Chrome & Grinding Co. Hazardous Waste Generator Training 15 March 2006

Training Performed by:

ESCI EnviroServices, Inc.

Steve Lichten

Ismael Pedroza

**Training Methodology:** 

Instructor-led, field-based.

Training Outline (Topical): Hazardous Waste Generator Personnel

#### I. Types of Wastes Generated

Туре	Hazards	Handling Precautions
Chromium-containing grinding sludge	Toxic by inhalation  Toxic by ingestion	<ul> <li>If dust is possible, wear dust masks/respirators</li> <li>Rubber/latex gloves</li> <li>Safety glasses (goggles if splashing is possible)</li> </ul>
Floor sweepings from grinding room operations	Irritating by skin contact	Wash hands frequently during the day and before breaks/at end of shift)
Spent hydrochloric/muriatic acid with chromium residuals (pre-treatment)	Toxic by inhalation  Toxic by ingestion  Corrosive by skin contact  Eye contact hazard	<ul> <li>Rubber gloves and apron</li> <li>Sleeve protection if arm contact possible</li> <li>Safety glasses (goggles if splashing is possible)</li> <li>Eyewash in immediate area</li> <li>Do not put into a metal container</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
Neutralized chromium- containing filter cake from waste acid treatment	Toxic by inhalation  Toxic by ingestion  Irritating by skin contact	<ul> <li>If dust is possible, wear dust masks/respirators</li> <li>Rubber/latex gloves</li> <li>Safety glasses</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
Used lubricating and hydraulic oils	Irritating by skin contact	<ul> <li>Latex gloves if much contact</li> <li>Safety glasses</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>

Туре	Hazards	Handling Precautions
Spent oily clean up sorbents	Irritating by skin contact	<ul> <li>Latex gloves if much contact</li> <li>Safety glasses</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>
Spent acid or chromium containing clean up sorbents	Toxic by inhalation  Toxic by ingestion  Corrosive or irritating by skin contact  Eye contact hazard	<ul> <li>If dust is possible, wear dust masks/respirators</li> <li>Rubber gloves and apron</li> <li>Sleeve protection if arm contact possible</li> <li>Safety glasses (goggles if splashing is possible)</li> <li>Wash hands frequently during the day and before breaks/at end of shift)</li> </ul>

- For any unknown or unidentified or unlabeled waste: Contact Ed or Mike if there is any question or doubt regarding what the waste is and how to handle it
  - i. Unknowns should be identified as soon as possible and labeled correctly.

#### II. Waste Compatibility

Some wastes can NOT be mixed together in the same container. Some waste containers can not be stored together:

Acid wastes must not be mixed with anything e	vthina els	anvt	with	mixed	be	not	must	wastes	Acid	
---	------------	------	------	-------	----	-----	------	--------	------	--

- Acid wastes can not be placed in a metal container. A poly or strong plastic container must be used.
- ☐ Acid waste containers should be stored in their own containment pallet with no other material or waste.
  - i. An eyewash should be in the area of waste acid handling
- ☐ Used oils and hydraulic fluids should not be mixed with anything else

#### III. Waste Container Labeling

	All hazardous waste containers (drums, boxes, and bags) and the used
	oil tank must be labeled as soon as the first piece or drop of waste is
	placed inside.
_	

- Labels must be clearly and neatly written
- ☐ Labels must be visible (not hidden)
- ☐ Labels must have:
  - i. Generator (company) name, address & phone number
  - ii. Description of the waste (contents & composition)

- iii. Physical state
- iv. Hazards
- v. EPA ID number (CAD008391427)
- vi. Accumulation start date (the date waste was <u>first</u> placed in the container)
- ☐ Ed or Mike may provide pre-completed labels for the different hazardous wastes. But the person first generating the waste and placing it in the container must 1) label the correct container, and 2) write the accumulation start date on the label.
- ☐ The EPA and Calif. Waste numbers and manifest document number will be marked by Ed or Mike when the waste is picked up for disposal.

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	O PEDERAL LAW PROHIBIT IMPROPER DISPOSAL. IN UNIL CONTACT HE REMEST FOUND ON PURICO SAFITY WORLD'S THE LIA SAFIE CONSIDER PROHIBITION A SOLICY CHAPTER AND STREET PROHIBITION ASSETS CHAPTER ASSETS
940 / 200E	
A LAWRENCE CO.	SALES ADDRESS
	LE PROFESSION L'ANGENING CAPIES
	ANDLE WITH CARE!

#### IV. Waste Container Handling & Management

Containers (drums, boxes, and bags) holding hazardous waste must be:

- ☐ In good condition: No sharp dents or damage and no major rusting
- ☐ Clean of residues and not leaking

	<u> </u>	Rept fully closed at all times – except when actually putting waste inside.
		i. Drum bungs screwed in
		ii. Drum lids placed on and the lid ring fully set and hand tightened
		iii. Funnels (if used) closed and latched
		iv. Proper box lid on waste boxes
		v. Bags tightly sealed
		Handled safely:
•		i. Moved using a drum dolly, or on a pallet using a forklift or hand
		cart, etc.
		ii. Stored away from operating machinery and equipment
		iii. Stored out of the aisles or exit routes
		iv. Plastic lining in sludge boxes
		Spacing between containers/rows of containers
		i. Spill residues and clean up materials are also a hazardous waste
•		Waste containers should be protected from the rain
		i. Kept inside, or
		ii. Containment pallets and cardboard boxes covered with a tarp or
	_	plastic sneet <u>before</u> the rain arrives
		Wastes must be disposed of within 90 days after accumulation start date
		i. Should have wastes picked up every 60 – 75 days
	•	
V.	Wast	e Tank Management
• •	Prage	C rank Management
	Та	inks (waste oil tank, waste treatment tanks) holding hazardous waste must
	be	:
		In good condition: No sharp dents or damage and no major rusting
		Clean of residues and not leaking
		Kept fully closed or covered at all times - except when actually putting
		waste inside.
		Secondary containment must be kept clean and free of wastes at all times
		<ol> <li>All spills, leaks or residues must be promptly removed and</li> </ol>
		containment area cleaned of residuals
	_	ii. Spill residues and clean up materials are also a hazardous waste
		vvastes must be disposed of within 90 days after accumulation start date
		<ul> <li>i. Should have wastes picked up every 60 – 75 days</li> </ul>
VI.	Eman	mamous O and at the Art Town
V1.	Emer	gency Containment Pit for Chrome Tanks
		The pit is for omersen as a second se
		The pit is for emergency containment only: It must be kept clean, dry and free of wastes at all times
	_	All spills, leaks or residues must be promptly removed and the pit cleaned of residuals
		i. Ed or Mike can contact a vendor/contractor to empty and clean

out the pit

ii. Do NOT enter the pit: it is a hazardous confined space.

### VII. Spills and Other Emergencies

#### Emergency Equipment

con	aware of the location of the following, and make sure they are in good dition and not being blocked by anything:
	Fire extinguishers Spill clean up absorbents, pads, etc. Emergency eyewash station(s) Gloves, goggles, aprons Phones or alarms (or alarm horns)
	Let Ed or Mike know immediately if any need to be replaced or repaired
<u>Sm</u>	all leaks or spills
	<ul> <li>If the spill, leak or amount of residue is: <ol> <li>Small in volume/amount, and</li> <li>Not still leaking out, and</li> <li>A material you normally handle, and</li> <li>Can be cleaned up by you or others in the immediate area, and</li> <li>And is not a significant safety or health hazard:</li> </ol> </li> </ul>
•	Clean up:
	<ul> <li>Use spill absorbents or sorbent pads/socks (if liquid)</li> <li>a. Used clean up material has the same hazards as the material spilled</li> <li>b. Do not walk into or through the spilled material to place sorbents</li> <li>c. Clean up completely and remove all sorbent materials</li> <li>d. Wear gloves, safety glasses and apron (if needed)</li> <li>Sweep and dust pan collection if solid</li> <li>a. Used clean up material has the same bazards as</li> </ul>
	<ul> <li>a. Used clean up material has the same hazards as the material spilled</li> <li>b. Clean up completely and remove all residues</li> <li>c. Wear gloves, safety glasses and (if dusting) a respirator or dust mask</li> </ul>
	<ul> <li>Collect the clean up material in a hazardous waste container, and make sure the container is properly labeled.</li> <li>Tell Ed or Mike immediately if any material or residue goes outside the building, off the property or into a drain.</li> </ul>

#### Larger leaks or spills

3	or in any 'er	ak or amount of residue is more than you can handle safely, nergency' situation (tank rupture, acid spill, fume or gas arge container leak):
. •	- 0	Get out of the immediate area and make sure others evacuate the area as well
		<ul> <li>a. Can take protective measures (shut of flow to tank or system if it can be done safely)</li> </ul>
		Sound the emergency alarm and/or immediately notify Ed or Mike
		Keep people out of the area
		Do not attempt clean up
		Evacuate entire facility if the emergency is big enough.
		<ol> <li>Evacuate to the front of the facility along the sidewalk.</li> </ol>
		b. Stay upwind
		c. Make sure everyone got out safely.
		Ed or Mike will call the Fire Department for emergency assistance

a. May call 9-1-1 if anyone is injured or exposed.

# Training Outline (Topical): Hazardous Waste Management Personnel

<i>L</i> ,	Waste Storage Area Inspections - Containers
	<ul> <li>□ All hazardous waste storage areas must be inspected on a weekly basis and a log of the inspections kept.</li> <li>□ Any employee can perform the inspections, but must be trained.</li> <li>□ Any problems found must be corrected as soon as possible, and the inspection form should indicate the corrective action.</li> <li>□ Completed inspection forms must be kept on file for three years.</li> <li>□ Items to inspect (see inspection form) include:         <ol> <li>i. Labeling of containers</li> <li>ii. Condition of containers (closed, in good condition, no significant residue)</li> <li>iii. Containers stored safely and properly (protected from weather, etc.)</li> <li>iv. Acids segregated from other wastes</li> <li>v. No spill or leak residues</li> <li>vi. Emergency equipment available and in good condition</li> <li>vii. Storage times within the 90 day limit (from the accumulation start date)</li> </ol> </li> </ul>
<i>II.</i>	Waste Storage Area Inspections – Tanks (including the waste treatment area)  All hazardous waste tanks and the waste treatment area must be inspected on a daily basis and a log of the inspections kept.  Any employee can perform the inspections, but must be trained.  Any problems found must be corrected as soon as possible, and the inspection form should indicate the corrective action.  Completed inspection forms must be kept on file for three years.  Items to inspect (see inspection form) include:  i. Labeling of tanks  ii. Condition of tanks and waste treatment containers (closed, in good condition, no significant residue)  iii. Waste treatment containers stored safely and properly  iv. Secondary containment in good condition (not cracked, etc.)  v. No spill or leak residues on tank, containers or in secondary containment  vi. Emergency equipment available and in good condition  vii. Storage times within the 90 day limit (from the accumulation startdate)
III.	Hazardous Waste Disposal Coordination and Records  ☐ Hazardous wastes must be removed for off-site treatment, storage or

		disposal within 30 days of the waste first being generated
		i. i.e. within 3 months of the accumulation start date on the tank or container
		ii. should have waste pickups well before that date approaches
		All waste labels must be fully completed (with the hazardous waste
	_	manifest number, EPA and Calif. Waste codes), and the container labeled
		with the appropriate DOT hazard labels.
		The disposal contractor may provide a completed hazardous waste manifest, but it still must be reviewed for accuracy and completeness
		before signing
		<ol> <li>A new manifest form is required after Sept. 5, 2006 (and may be in use now).</li> </ol>
		· · · · · · · · · · · · · · · · · · ·
	_	The DTSC copy of the manifest must be mailed to DTSC within 30 days of the shipment/pickup (see instructions on the manifest)
		The 'generator retains' cany of the manifest at a stable to the
		The 'generator retains' copy of the manifest should be kept on file
		The treatment, storage or disposal facility must send you a signed copy
		(with their signature on it) within 30 days of the waste shipment/pickup
		<ol> <li>Match it with the signed copy you filed from when it was first picked up</li> </ol>
		ii. Make sure there are no changes
		iii. Staple the two copies together
		iv. Keep them on file for at least three years (suggest you file them in
		chronological order)
	J	If you do NOT get the signed copy back within 30 days, call the vendor
		and disposal facility ASAP to get your signed copy. If a copy is not
		received within 45 days total, you must notify the Fire Department and the
		State.
I	J	Obtain copies of all hazardous waste profiles or approvals from the
		disposal vendor and keep them on file for three years.
	_	the same of the sa
1	U	her Hazardous Waste Records
-	Γh	e following bazardous wasto related records about the last to the
1	hr	e following hazardous waste related records should be kept on file for ee years:
•		<b>, , , , , , , </b>
1		Training records
(	]	Hazardous waste manifests
[	J	Hazardous waste identification/testing documents or waste profiles
(	J	Operating instructions for the waste treatment system
	_ _	· · · · · · · · · · · · · · · · · · ·
	_ 	
	7	Records of emergency equipment testing or maintenance
L		Any records of any repairs or maintenance to waste tanks or treatment systems
(	<b>.</b>	Hazardous waste biennial report (covers every odd numbered year, and
		must be submitted by March 1 of every even numbered year)
ſ		Hazardous Waste Manifest Verification Questionnaire and Fee payments
		(must be submitted to DTSC annually – arrives approx. May to June)
ſ	J	Hazardous waste disposal taxes (must be paid to State Board of
		Equalization – arrives approx. May to June)

IV.

	•
	<ul> <li>Santa Fe Springs Fire Department CUPA permit and record of fees paid.</li> <li>Hazardous wastes must be removed for off-site treatment, storage or disposal within 90 days of the waste first being generated</li> </ul>
<b>'</b> .	Spill and Release Reporting
	In the event a spill or leak or other release of hazardous materials or wastes meets any of the following conditions, it must be immediately reported (reporting instructions follow):
	□ Substantial hazard to:  i. Health ii. Safety iii. Property, or iv. The environment □ Can not be cleaned up by employees in the immediate work area and poses a potential safety or health hazard to clean up employees □ Leaves the property (including publicly accessible areas like the front parking lot) or enters any storm drain or sewer drain □ Anyone is hurt, injured or exposed to chemicals  Reporting must be made immediately upon determining that any of the above conditions exist (and that determination must be done quickly). Notify: □ Santa Fe Springs Fire Department (562-946-3800) □ 9-1-1 (if an emergency exists) □ Calif. Office of Emergency Services (800-852-7550)

# ELECTRONIC CHROME & GRINDING INDIVIDUAL EMPLOYEE TRAINING REVIEW FOR HAZARDOUS WASTE TREATMENT SYSTEM

116Q010A-8 Ref. Pgs. 23,24 Pg 1 of 1

	-	•
Name of Trainer B	ARRY BROWN/BAB-CAN CONSU	Date Nov. 17, 2005
Training Subject	ANNUAL MEETING FOR HAZA	RDOUS WASTE TREATMENT
Training Material	s Used <u>SB-198 PROGRAM N</u>	NOTEBOOK AND EMPLOYEE MANUAL
Name of Employee	Robert Sauzeda	
Date of Hire/Assi	gnment 10/03/05	
I, Robert Sauz	eda her ibed above in the follow	reby certify that I received
required for operator.  The hazards right to infethose chemical employer on reprisal.	of any chemicals to which cormation contained on Marals, and how to understant ask questions, or provides safety either directly of	personal protective equipment as hazardous waste treatment in I may be exposed and my terial Safety Data Sheets found this information.  e any information to the ranonymously without fear o
- Disciplinary compliance w	procedures the employer ith Codes of Safe Practi	will use to enforce ce.
the entire facil	ity. I also understand	comply with the Codes of Saf Codes of Safe Practice for that a violation of these on and I could be terminated
Roberto SAVC Employee Si	EDA gnature	11-17-05 Date
- Ed Fruck		
Supervisor S	ignature	//-17-05 Date

# ELECTRONIC CHROME & GRINDING INDIVIDUAL EMPLOYEE TRAINING REVIEW FOR HAZARDOUS WASTE TREATMENT SYSTEM

116Q010A-8 Ref. Pgs. 23,24 Pg 1 of 1

Name of Trainer BARR	Y BROWN/BAB-CAN CO	NSULTING Dat	e NOv. 17, 2005
Training Subject AN SY	NUAL MEETING FOR H.	AZARDOUS WASTE	TREATMENT
Training Materials L	Jsed <u>SB-198 PROGR</u>	M NOTEBOOK AND	EMPLOYEE MANUAL
<u> </u>			
Name of Employee	Ray Ramirez		
Date of Hire/Assign	ment03/06/03	•	
I, Ray Ramirez training as describe	ed above in the fo	hereby certify llowing areas:	that I received
- The Codes of Saconditions, safe required for my operator The hazards of right to inform those chemicals - My right to ask employer on safe reprisal.	with my job station fe Practice which e work practices an work and in my j any chemicals to w ation contained on , and how to under cuestions, or pro- ety either directl	indicate the sand personal propersonal pro	afe work otective equipment waste treatment exposed and my ty Data Sheets for ormation. mation to the ly without fear of
- Disciplinary pr compliance with	ocedures the emplo Codes of Safe Pra	yer will use to ctice.	enforce
I understand this to Practice for my John the entire facility rules will result in from my job  Employee Signature	. I also understa	al Codes of Sag	fe Practice for
Ed Kuck Supervisor Sign	nature		-/7-05 Date

# ELECTRONIC CHROME & GRINDING INDIVIDUAL EMPLOYEE TRAINING REVIEW FOR HAZARDOUS WASTE TREATMENT SYSTEM

Salvador Flores

Name of Employee

Date of Hire/Assignment  $\frac{01/21/94}{}$ 

116Q010A-8 Ref. Pgs. 23,24 Pg 1 of 1

Training Subject  ANNUAL MEETING FOR HAZARDOUS WASTE TREATMENT  SYSTEM.  Training Materials Used SB-198 PROGRAM NOTEBOOK AND EMPLOYEE MANUAL	Name of Trainer I	BARRY BROWN/BAB-	-CAN CONSULTING	Dat	e Nov. 17,	2005
Training Materials Used SB-198 PROGRAM NOTEBOOK AND EMPLOYER MANUAL		ANNUAL MEETING			TREATMENT	
	Training Materia	ls Used <u>SB-198</u>	PROGRAM NOTEBO	OK AND	EMPLOYER	MANITA:

I, Salvador Flores hereby certify that I received training as described above in the following areas:

- The potential occupational hazards in general in the work area and associated with my job station and hazardous waste treatment system.
- The Codes of Safe Practice which indicate the safe work conditions, safe work practices and personal protective equipment required for my work and in my job as hazardous waste treatment operator.
- The hazards of any chemicals to which I may be exposed and my right to information contained on Material Safety Data Sheets for those chemicals, and how to understand this information.
- My right to ask questions, or provide any information to the employer on safety either directly or anonymously without fear of reprisal.
- Disciplinary procedures the employer will use to enforce compliance with Codes of Safe Practice.

I understand this training and agree to comply with the Codes of Safe Practice for my Job Station and General Codes of Safe Practice for the entire facility. I also understand that a violation of these rules will result in a disciplinary action and I could be terminated from my job.

Salvador Deviños Flores Employee Signature	
Supervisor Signature	//-/7-05 Date

# CONTINGENCY PLAN & EMERGENCY PROCEDURES

**FOR** 

ELECTRONIC CHROME & GRINDING CO. INC.

9128-32 DICE RD.

SANTA FE SPRINGS, CA 90670

(310) 946-6671

**MARCH 1992** 

CALIFORNIA CODE OF REGULATIONS
TITLE 22
DIVISION 4.5
CHAPTER 15
ARTICLES 3 & 4, and
SECTION 66265.16

PREPARED BY
BAB-CAN CONSULTING, P.O. BOX 7081, CITY OF INDUSTRY, CA 91744
714-594-0500

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# **ELECTRONIC CHROME & GRINDING CO.**

# SANTA FE SPRINGS, CA.

# **CONTINGENCY PLAN**

# **PURPOSE**

Electronic Chrome & Grinding Co. has developed a hazardous waste contingency plan to minimize hazard to human health or the environment from fires, explosions, or any sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil surface, and water. The provision of the plan will be carried out immediately whenever there is a fire, explosion, or release of hazardous waste constituents which could threaten human health or the environment.

# SECTION 1. FACILITY DESCRIPTION

Type of Facility:

Hard Chrome Plating & Grinding Facility

EPA ID. Number:

CAD 008-391-427

Address:

9128-32 Dice Road

Santa Fe Springs, CA 90670

Location:

North of Los Nietos Rd. and South of Slauson Avenue

Thomas Guide Page Number - 706,

Intersection of J and 2.5

County:

Los Angeles

Telephone Number:

(310) 946-6671

Fax Number:

**(310) 946-6671** 5903

Owner/Operator:

Philip W. Reed

Mailing Address:

9128-32 Dice Road

Santa Fe Springs, CA 90670

Contact:

Mike Reed

Business Telephone #:

(310) 946-6671

Residence Address:

FX-6: Personal Privacy

Residence Telephone #:

# Electronic Chrome & Grinding Co. is located at: 9128-32 Dice Rd. Santa Fe Springs, CA 90670

From the 605, San Gabriel River Freeway exit at Slauson Ave. and turn right (South) onto Pioneer and proceed to Slauson Ave. turn left (East) on Slauson Ave. and proceed approximately one mile to Dice Rd. turn right (South) onto Dice Rd. and proceed across railroad tracks approximately 3/4 of a mile. Our facility is on the left (east) side of the street just north of Los Nietos Road.

# SECTION 2. GENERATION OF HAZARDOUS WASTE

Hard chrome plating is the process by which chromium, a very hard non-reactive, slippery metal is applied to the surface of other metals to improve their durability, strength, rust resistance and coefficient of friction. Hard chrome is used extensively in the aerospace industry on fasteners, hydralic systems, landing gears, control surface actuators, etc. It is also used widely in the oil industry to prevent wear which could result in leaks, blowouts, etc.

The process consists of a bath containing electrically charged chrome ions which are repelled by lead anodes and attached by the cathodicly charged item being chrome plated. The chrome bath consists of 32 oz. of Chrome per gallon of H<sub>2</sub>O, .35 oz. of Sulfuric Acid per gallon of H<sub>2</sub>O as a catalyst.

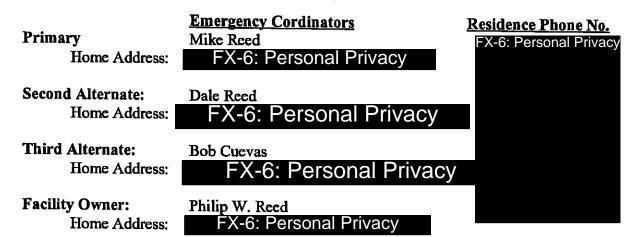
The hazardous waste generated is minimal for the size of the operation. Small quantities are generated from the spent solution from the chrome stripping tank.

The spent chrome stripping chemical tank solution is put through a Chrome Precipitation and Evaporation System which renders only a small quantity of filter cake which is then packaged per applicable regulations, stored for a period less than 90 days and lawfully transported by a registered hazardous waste hauler, to a Class I Landfill for disposal.

# SECTION 3. EMERGENCY COORDINATORS AND RESPONSE PROCEDURES

The following is a listing of personnel designated as having authority to assume supervisory responsibility in the event of a spill or other contingency. Phone numbers are listed so that they may be contacted at any time their services are required for this function.

Details of the responsibilities to be assumed by the Emergency Coordinator are presented below and the procedures to be implemented for response are outlined in Section 3.6 (Incident Response - Release of Hazardous Waste, Fire or Explosions).



# RESPONSIBILITIES OF EMERGENCY COORDINATOR

The Emergency Coordinator (EC) is responsible for coordinating all emergency response measures and as such has the authority to commit the resources needed to carry out this Contingency Plan.

Personnel qualified to act as an EC are on the premises or on call and capable of quick arrival at all times. The EC is thoroughly familiar with:

- All aspects of this contingency plan;
- All operations and activities at the facility;
- Location and characteristics of wastes handled;
- Location of all records within the facility, and
- Facility layout.

In the event that the Primary Emergency Coordinator is not present at the plant when an incident occurs requiring action, the next designated person on the list who is present at the facility will assume responsibility for immediate response activities. In any event, one or more of the Emergency Coordinators must be present at the facility or on call during any part of the day. The Emergency Response Coordinator acting at the facility will have responsibility for summoning personnel and outside contractors, which may be necessary to respond to the incident, will contact emergency response personnel who may be needed to

assist with the response, and will direct response activities, including designation of methods for clean-up and disposal of material from the incident.

## **EMERGENCY RESPONSE PROCEDURES**

The emergency response procedure can be broken down into the following steps;

# 3.1 Recognition of Potential or Actual Emergency Situation

Site personnel are trained to recognize potential incidents which may result in an emergency. This training is included as part of the requirements of 40 CFR 265.16. If there is any reasonable chance that a particular situation or incident represents an emergency or imminent hazard to public health or the environment, site employees shall report such a situation or incident to their immediate supervisor, who in turn will contact the Primary Emergency Coordinator, who will make the determination as to whether an emergency hazard exists. Incidents which must be reported include spills, materials release, fire and/or explosions. Outside agencies will be notified at this time by the Emergency Coordinator for incidents requiring immediate response (fire, explosion, etc.).

# 3.2 Notification of Emergency Coordinator

Upon recognition of any incident or situation which could potentially lead to an emergency, site employees or management shall notify the Emergency Coordinator by phone or pager without delay after leaving the immediate area. The Emergency Coordinator shall notify the appropriate local, state and federal agencies (see Section 4.1 - Local Authorities Providing Assistance).

#### 3.3 Evacuation Procedure

In the event of an emergency which would require total evacuation of the Facility, notification will be made through the horn/intercom telephone system. The routes of evacuation to be taken are posted through-out the facility.

Once evacuated, personnel will assemble outside the front door to the facility at the employee staging area, (conditions permitting - wind direction, other risks, etc.). A designated employee will conduct a head count at the assembly area and report results to the Emergency Coordinator as soon as possible. Personnel not able to report to an assembly area will contact the Emergency Coordinator individually, as soon as possible.

#### 3.4 Hazard Determination

This key step shall be the responsibility of the Emergency Coordinator. The Emergency Coordinator will obtain the following information to permit a hazard evaluation.

- A. Type of incident (materials release, spill, fire, flood, explosion, etc.).
- B. Location of incident.
- C. Injuries and/or fatalities involved.
- D. Type, quantity and nature of material involved (this data is available from review of site records, hazardous manifests, site operations plan, etc.).

This information should provide sufficient data for the Emergency Coordinator to evaluate the situation and to determine whether an imminent hazard or emergency exists. If necessary, a visual inspection of the situation shall be carried out from an upwind location at a prudent distance.

# 3.5 Implementation of the Contingency Plan

Once the Emergency Coordinator has determined that an emergency situation exists, he shall immediately implement the Contingency Plan. The actual steps to be taken will depend on the nature of the emergency; i.e., fire, explosion, materials release or spill. Regardless of the nature of the emergency, the following shall be the initial steps the Emergency Coordinator shall take after the hazard assessment.

- 1. Notify the facility personnel, then the City of Santa Fe Springs Fire Department of any emergency regardless of whether outside assistance is required. The Fire Department is the local area control point of emergency response. Other agencies are listed in Section 4.1 (Local Authorities Providing Assistance), use Form 9.1-Emergency Event Reporting Form (On Site).
- 2. If it is determined the emergency could threaten human health or the environment outside the facility, the Emergency Coordinator must notify, in order, the appropriate local, state and federal agencies listed in Section 4.2. (Agencies to be Notified in a Spill Event), with a report as follows: Use Form 9.2-Emergency Event Reporting Form (Off Site).
  - A. Name and phone number of person reporting.
  - B. Name and address of facility.
  - C. Time and type of incident.
  - D. Name and quantity of material involved.
  - E. The extent of injuries.
  - F. Possible hazards to human health or the environment outside the facility.

Completion of the Emergency Event Reporting Form will ensure that all the appropriate information is reported. This form is shown as 9.1-Emergency Event

Reporting Form (On Site) or 9.2-Emergency Event Reporting Form (Off Site) as appropriate.

# 3.6 Incident Response

The following sections deal with specific actions to be taken in the event of materials spills or releases, fires or explosions and floods.

#### 3.6.1 Release of Hazardous Waste

In the event of a release of hazardous wastes or hazardous waste constituents, the steps outlined above shall be taken prior to abatement activity. To reiterate briefly, these consist of:

- 1. Recognition of emergency situation.
- 2. Notification of Emergency Coordinator.
- 3. Hazard evaluation.

Most releases or spills of hazardous waste at this site can be contained or the condition corrected through the use of the front-end loader, pumps, or vacuum trucks, depending on the quantity and physical state of the spilled or released material. The magnitude of response will depend on the quantity and type of material spilled.

The first step, after items 3.1 (Recognition of Potential or Actual Emergency Situation), 3.2 (Notification of Emergency Coordinator), and 3.3 (Evacuation Procedure) discussed above shall be to isolate the affected area to prevent unnecessary exposure and contamination of personnel or equipment. Isolation measures consist of barricading off solid waste spills. Liquid waste spills shall be contained by isolation of the affected containment area by dikes of absorbent material. The size of the isolated area will depend upon the quantity of released material but will be confined to the smallest possible area. The next step shall be to remove the spilled or released material. Equipment available on-site shall be used. If this is insufficient, additional equipment shall be summoned as required. The spilled material as well as adjoining and underlying soil shall be transported offsite for disposal. The same procedure, but on a larger scale, shall be used should the spill be larger. If necessary, additional equipment is available from California Chemical Disposal Company, who are on call 24 hours a day at (213)-834-8077.

In the event of small liquid waste spills, it is possible that the material will have been absorbed into the soil faster than the equipment or absorbent can be brought onto the scene. In that case, the contaminated soil and the dirt adjoining it shall be removed. The underlying or neighboring soil shall be tested for residual contamination and removed if necessary.

Larger liquid waste spills shall be diked off. Once the spill has been contained, a vacuum truck shall be obtained. The vacuum truck(s) shall be used to draw off the contained spill for transport offsite. Once all of the liquid has been removed, the contaminated soil shall be loaded onto plastic lined end-dump trucks using front-end loaders. This hazardous waste shall then be disposed offsite. As with the small liquid spills, the underlying soil shall be sampled and removed in the event of residual contamination.

In the event of an offsite release, the responsible management person will contact all appropriate federal, state and local authorities with the following information as conditions dictate (see Section 4.2 -Agencies to be Notified in a Spill Event). Use Form 9.1 Emergency Event Reporting Form (On Site) or Form 9.2 Emergency Event Reporting Form (Off Site) as appropriate.

- 1. Name and telephone number of reporter.
- 2. Name and address of facility.
- 3. Time and type of incident.
- 4. Name and quantity of material involved.
- 5. The extent of injuries.
- The possible hazards to human health and the environment.

Use of the Emergency Event Reporting Form will facilitate the communication of this information. The appropriate agencies are listed in Section 4.2 (Agencies to be Notified in a Spill Event).

#### 3.6.2 Fire

#### In case of fire:

- A. Notify site management and the Santa Fe Springs Fire Department immediately. Notify site personnel (horn/intercom telephone sounding system).
- B. Site management will determine the type of fire, method of fire fighting and notification sequence. In any case, one operator will be dispatched to man the front driveway entrances where he will stay until relieved by a management person or a guard service arrives.
- C. In case of chemical fires, it is very important that water not be applied immediately but the situation be fully evaluated prior to application of water. In emergency situations, water may not always be the best control measure. Extinguish by means of a fire extinguisher or, whenever determined appropriate, a fire hose. If the nature of the product on fire is unknown, evacuate the immediate area to an upwind location and wait for management instructions.

D. Site management will be assessing the hazard potential and will direct personnel accordingly.

All fires should be approached with protective equipment appropriate to known hazards. If hazards cannot be readily assessed, protective equipment appropriate to the worst known hazard must be worn.

An escape route must be predetermined for the fire crew. Every effort will be made to prevent spread of a fire or reduce its magnitude in the least amount of time, consistent with safety of the fire team.

# 3.6.3 Fire Fighting Stations

- A. Fire extinguisher upon notification of site management personnel of the situation, the person first sighting the fire should secure the closest extinguisher for extinguishing and/or containment of the fire. Additional extinguisher help may be needed.
- B. Fire hydrant closest to the fire additional personnel shall be directed to the nearest accessible fire hydrant station. If, after management fire assessment, it is determined water would be of aid to extinguishing the fire, the water will be turned on. If not used for fighting, the water could be used to cool other chemical tanks/containers. etc. in close proximity to the actual fire as directed by site management.
- C. Maintenance mechanic one man will be notified by the Emergency Coordinator to stand by with tools available.
- D. Traffic Control one person will be directed by the Emergency Coordinator to close the driveway entrances to all incoming traffic, except emergency vehicles. This person will also be responsible for keeping the access road to the facility clear and unobstructed for emergency response teams. This person will also be responsible to hold all vehicles at the building until an evacuation route for onsite vehicles has been determined.
- E. Employee Staging area The parking lot outside the front door of the building all personnel will report to this area when possible and await management instructions.

# 3.6.4 Fire (uncontrollable)

A. Call for help. Alert personnel (horn/intercom telephone system). Notify a management person and notify the fire department.

- B. Evacuate the area. Whenever possible, evacuate the hazard area by moving upwind from the fire. Follow evacuation procedure; if it be comes necessary to evacuate the site, report to the parking lot at the corner of Los Nietos and Dice Road.
  - C. Follow management instructions. Report to waiting area or assembly area for further direction.

#### 3.6.5 Explosions

- A. Alert site personnel (horn/intercom telephone system) as to the degree and location of the explosion. Instruct personnel to stay clear of the area involved.
- B. Notify a management person. The Emergency Coordinator is to notify the fire department.
- C. If a fire develops, follow emergency procedures for fire control or evacuation. The Emergency Coordinator will give the order to evacuate if necessary.
- D. Equipment which may have been directly or indirectly affected by the explosion shall be removed from service once management personnel have determined the area to be safe for entry. The affected equipment shall be inspected and certified fit prior to return to service.
- E. Follow instructions as directed by the Emergency Coordinator on the scene.
- F. Once the emergency condition is no longer imminent and site evacuation deemed not to be necessary, site personnel are to meet at the office for a head count.

#### 3.7 Prevention of Recurrence

An important part of the Contingency Plan is the prevention of recurrence or spread of fire, explosion or materials release. Specific steps will depend on the nature of the emergency.

If necessary, operations at the site will be suspended so that no additional hazardous waste materials are brought onsite. If operations are temporarily halted in response to an emergency, the site will be inspected for appropriate leaks, smoldering fire, etc., prior to restarting affected operations.

In the event of a fire, release or explosion, steps will be taken to prevent its spread by isolating the surroundings, shutting down processes and isolating adjacent areas as required and as conditions allow. The immediate recurrence of fires and explosions will be controlled by cooling, isolation, fire fighting foam, etc., until it can be determined that the conditions (heat, source of ignition, materials, etc.) have been reduced and/or eliminated.

The following items shall be checked after any major act of God (earthquake, flood, storm, etc.).

- A. Inspect all tankage or containment vessels for signs of leakage or damage.
- B. Inspect all operational units for proper operation mode and manually check to insure all automatic and alarmed features on units are working.
- C. Inspect all piping, valves and fixed pumping units for damage.
- D. Inspect electrical boards, overhead electrical lines and poles for damage.
- E. Check waste storage area for signs of leakage or damage to storage drums.
- F. Check all buildings and fencing for damage.
- G. Conduct a general survey of the site looking for signs of land movement, etc.

Take any necessary corrective measure, however temporary, to rectify potential or real problems. Contact the management person on duty or on call to relate the inspection results. Use Form 9-3-1 (Inspection Form).

#### 3.8 Attainment of Control

The Emergency Coordinator shall determine when the emergency situation has been controlled. Control will be deemed attained when the risk to environment, the health of employees and to the public arising from the incident will have been minimized. As a minimum, this shall entail the extinction of all fires and the control of any spills or leaks. Also, any emergency equipment used must be replaced and ready for reuse, and any released material must be contained or disposed. Inspection of the site will be conducted prior to return to normal operating status, at which time notification of appropriate local, state and federal authorities will be made. Within 15 days of implementing the Contingency Plan, a report of the incident must be filed with the appropriate agencies, including: (see Section 4.2 - Agencies to be Notified in a Spill Event).

- U. S. Environmental Protection Agency
- County of Los Angeles Fire Department,
   Fire Prevention, Preparedness and Conservation Bureau
- California Environmental Protection Agency, Dept. of Toxic Substances Control
- Regional Water Quality Control Board

- 1. Name, address and telephone number of operator or owner.
- 2. Name, address and telephone number of facility.
- 3. Date, time and type of incident.
- 4. Name and quantity of material involved.
- 5. Assessment of actual or potential hazards to human health or the environment.
- 6. Quantity and disposition of recovered materials.
- 7. Number and extent of injuries involved.

This report shall be presented by use of the Emergency Event Report, Form e Form 9.1 Emergency Event Reporting Form (On Site) or Form 9.2 Emergency Event Reporting Form (Off Site) as appropriate.

# SECTION 4. OUTSIDE NOTIFICATION AND COORDINATION AGREEMENTS

ELECTRONIC CHROME & GRINDING CO. has agreements with local authorities to provide assistance in the event of an emergency. A list of primary local authorities which may provide assistance is presented below:

# 4.1 LOCAL AUTHORITIES PROVIDING EMERGENCY ASSISTANCE TO ELECTRONIC CHROME & GRINDING CO.

AGENCIES	Telephone Number:
* Fire Response: City of Santa Fe Springs Fire Department 11300 Greenstone Avenue Santa Fe Springs, CA 90670	<b>9 1 1</b> (310) 944-9713
* Paramedics:	911
* Police Response: Norwalk Sheriff Station 12335 Civic Center Drive Norwalk, CA 90650	9 1 1 (310) 863-8711
* Hospitals and Clinics: Slauson-Sorenson Medical Clinic 11823 E. Slauson Ave., Suite 40 Santa Fe Springs, CA 90670	(310) 696-1161
Presbyterian Inter-Community Hospital 12401 E. Washington Blvd. Whittier, CA 90606	(310) 698-0811
* County of Los Angeles Fire Department Fire Prevention, Preparedness and Conservation Bureau Hazardous Materials Control Program 2615 South Grand Avenue Los Angeles, CA 90007-2668	(213) 744-5316
* California Chemical Disposal 1815 East O Street Wilmington, CA 90744	(213) 834-8077 (800) 828-4455

# 4.2 FEDERAL AND STATE AGENCIES TO BE NOTIFIED IN A SPILL EVENT

AGENCIES	Telephone Number:
California Environmental Protection Agency Dept. of Toxic Substances Control (Region 3) 1405 N. San Fernando Blvd. Burbank, CA 91504	(818) 567-3000
County of Los Angeles Fire Department Fire Prevention, Preparedness and Conservation Bureau Hazardous Materials Control Program 2615 South Grand Avenue Los Angeles, CA 90007-2668	(213) 744-5316
US EPA, Toxic Spills Division T-3-3 215 Fremont Street San Francisco, CA 94105	(415) 974-8131
Regional Water Quality Control Board (4) 101 Centre Plaza Drive Monterey Park, CA 91754-2156	(213) 266-7500
EMERGENCY RESPONSE	911
OFFICE OF EMERGENCY SERVICES	(800) 852-7550 (916) 427-4341
NATIONAL RESPONSE CENTER	(800) 424-8802
Department of Transportation	(202) 426-1830
California Chemical Disposal 1815 East O Street Wilmington, CA 90744	(213) 834-8077 (800) 828-4455

Each of the above local (Section 4.1) authorities have a copy of the Contingency Plan presented and has been familiarized with:

- 1. The layout of the facility; as per drawing attached;
- 2. Properties of hazardous waste handled at the facility and associated hazards;
- 3. Places where facility personnel would normally be working;
- 4. Entrances to and roads inside the facility;
- 5. Possible evacuation routes; and
- 6. The types of injuries or illness which could result from fires, explosions or releases.

#### 4.3 EXTERNAL REPORTING

Within 15 days after an incident involving implementation of this contingency plan, Electronic Chrome & Grinding Co. will submit a written report on the incident to the County of Los Angeles Fire Department, Fire Prevention, Preparedness and Conservation Bureau, California Environmental Protection Agency, Dept. of Toxic Substances Control, U. S. Environmental Protection Agency, Regional Water Quality Control Board. The report will include:

- 1. Name, address and telephone number of the owner or operator;
- 2. Name, address and telephone number of the facility;
- 3. Date, time and type of incident (eg. fire, explosion);
- Name and quantity of material(s) involved;
- 5. The extent of injuries, if any;
- 6. An assessment of actual or potential hazards to human health or the environment, where this is applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

Use Form 9.1 Emergency Event Reporting Form (On Site) or Form 9.2 Emergency Event Reporting Form (Off Site) as appropriate.

# SECTION 5. SPILL RESPONSE PROCEDURE

Because of the great degree of containment and the generally conventional nature of material handled at this facility, it is not anticipated that a spill response of any great magnitude or complexity will ever be required.

However, as protection against such an occurrence, California Chemical Disposal Company has been contracted with us to provide back-up spill response in the event it is needed. This company is on call 24 hours per day, 365 days per year, at 213-834-8077 or at 800-828-4455. They have a wide range of equipment for use in response activities and trained personnel. The company name and phone number are shown above and on Section 4.2 (Agencies to be Notified in a Spill Event).

In the event of a spill, the following procedure is to be followed by all plant personnel:

- 1. The person detecting the spill should immediately stop the source of the spill and prevent flow to the outside if this can be done safely. Stopping the spill may involve turning off pumps, closing valves, righting a barrel or other appropriate action. It should be noted that any spill greater than a 55 gallon drum must be turned over to California Chemical Disposal Company, who are on call 24 hours a day at (213) 834-8077, or (800) 828-4455.
- 2. The Emergency Coordinator should be summoned to the scene and informed of the source and nature of the spill and of mitigation activities which have been carried out up to that time.
- 3. The Emergency Coordinator will then assume responsibility for directing cleanup activities. He will summon to the scene that manpower and equipment which is needed to respond to the incident and will direct their activities for the duration of the response.
- 4. He will contact, or have a designated person contact any support groups whose assistance is needed in the response effort, such as the police or fire departments. Notification of regulatory agencies, should it be required, will be handled in accordance with the provisions of Section 3 (Emergency Coordinators and Response Procedures) and Section 4 (Outside Notification and Coordination Agreements).
- 5. Once the spill has been isolated from possibly leaving the site and the source of the spill has been eliminated, efforts will be directed toward containment of the spilled material within the smallest area possible. This should help minimize the amount of area which must be cleaned up and decontaminated, making the response effort as efficient as possible.
- 6. After the bulk of the spilled material has been removed, final cleanup of the area will be conducted. This will include decontamination of the area and equipment

used for the clean-up, in a manner which will return the affected area to its previous level of usefulness and safety.

Whenever possible, cleanup will be conducted in a manner which will permit reuse of the material, either in processing operations directly or for some related purpose. When this is not possible, disposal of material resulting from the cleanup will be in accordance with all applicable regulation.

# 5.1 TYPES OF CHEMICALS UTILIZED

To present the contingency plan in a concise manner, spill response procedures/hazards for the most likely types of chemicals utilized on site have been summarized as follows:

- Aqueous wastes. Generally non-flammable wastes. Consists of dilute solutions of chromic acid.
- Flammable liquids. Primarily single drum quantities of 1,1,1-Trichloroethane, Mineral Spirits 75, and Velocite Oil # 10.
- · Acids. Primarily hydrochloric.
- · Caustics. Strong bases such as hydroxides.
- Oxidizers. Chromic Trioxide

# 5.1.1 AQUEOUS WASTE (A-132) - Plating Tanks

# POTENTIAL HAZARDS

#### FIRE:

Product is not combustible. May react with organic materials rapidly enough to cause ignition. Avoid contact with combustibles.

#### **EXPLOSION:**

Product is not combustible. May react with organic materials rapidly enough to cause ignition. Avoid contact with combustibles.

#### HEALTH:

Vapor may be irritating, if breathed. Contact with material may cause severe burns to skin and eyes. Fuming liquids may release vapors which are highly toxic and/or destructive to eyes and mucous membranes. Contaminated water or material runoff may pollute water supply. Fire may produce toxic fumes.

# **EVACUATION** (if necessary):

1,000 Feet (400 Paces) Minimum in all directions. Also throughout plus half this distance on all sides of any area endangered by vapor cloud.

## IMMEDIATE ACTION INFORMATION

#### GENERAL:

No unnecessary personnel. Keep upwind. Identify product and isolate hazard area. Wear firefighters full protective clothing, including eye protection, chemical resistant gloves, and self - contained breathing apparatus. Special clothing may be required. Refer to MSDS for specific information.

FIRE: (Non-flammable)

#### SPILLS:

Stop leak if without risk. If possible use absorbent rags or towels to contain spill, but proceed with extreme caution. If runoff cannot be contained, notify downstream health, water, and sanitation district. If qualified, obtain pH reading; do not attempt to neutralize unless trained. Dilute spill with large amounts of water from low pressure streams. Watch for reaction and avoid vapor clouds. Dike ahead for later disposal. Your contaminated clothing and absorbent material should be properly disposed of.

#### FIRST AID:

Remove to fresh air. Call physician. In case of contact with material or water solution, immediately flush skin or eyes with running water for at least 15 minutes. Remove contaminated clothing and shoes. Keep patient at rest; treat for shock. Effects of contact or inhalation may be delayed. Rescue and ambulance personnel should wear rubber gloves.

#### PERSONAL PROTECTION:

Avoid contact with the waste and stand upwind. Wear rubber gloves, safety goggles, a half-face respirator with organic vapor cartridges and other equipment to prevent contact with the body. For skin contact: remove all contaminated clothing and flood skin with water. For eyes: hold eyes open and flush with water. If symptoms persist or develop, seek medical attention.

# 5.1.2.a FLAMMABLE LIQUIDS (A-95) - Mineral Spirits #75 and Petroleum Distillate (Mobil Velocite Oil #10)

#### POTENTIAL HAZARDS

#### FIRE:

May be ignited by heat, sparks, or open flame. Ignition of vapor may occur at some distance from leaking container. Vapor entering sewer or other

closed spaces may create explosion hazard.

#### **EXPLOSION:**

Heated containers may rupture violently and produce flying missiles.

#### HEALTH:

Fires may produce irritating gases. Vapors may cause dizziness, suffocation, or narcosis (unconsciousness), if breathed, particularly in confined area. Vapors are likely to be invisible.

#### EVACUATION(if necessary):

Fire:

1,500 Feet (600 Paces) Minimum in all directions.

No Fire:

1,000 Feet (400 Paces) Minimum in all

directions. Also, throughout plus half this distance on all sides of any area endangered by vapors.

## IMMEDIATE ACTION INFORMATION

#### **GENERAL:**

No unnecessary personnel. Keep upwind. Identify product and isolate hazard area. Self-contained breathing apparatus should be available. Wear full protective clothing.

#### FIRE:

On small fire, use dry chemical or carbon dioxide. On large fire, use standard firefighting agents. Refer to MSDS for water solubility if firefighting foam is to be used. Move exposed containers from fire area, if without risk. Cool containers with water. Continue cooling after fire has been extinguished. The fire may appear extinguished but flash-back can occur along vapor trail and re-ignite it. Water spray may be useful in knocking down vapors.

#### SPILLS:

Within hazard area: Eliminate all sources of ignition. No flares, no smoking, no open flames. Stop leak if without risk. Use water spray to reduce vapors. Dike large spills for later disposal. Use noncombustible absorbent material to collect small spills. Prevent integration of material with oxidizing substances. Vapors from spilled or leaking liquids will probably be heavier than air and may travel some distance from source. Use combustible gas detectors to determine fringe areas. Contaminated clothing and absorbent material should be sealed in a vapor-tight container for eventual disposal as a hazardous waste.

#### PERSONAL PROTECTION:

Avoid contact with the material and stand upwind. Wear rubber gloves, safety goggles, a half-face respirator with organic vapor cartridges, and other

equipment to prevent contact with the body. For skin contact: Remove all contaminated clothing and flood skin with water. For eyes: hold eyes open and flush with water.

#### FIRST AID:

Remove to fresh air. Use standard first air procedures.

# 5.1.2.b FLAMMABLE LIQUID (A-82) - 1,1,1-Trichlorethane

#### FIRE:

This material is nonflammable and nonexplosive under normal conditions of use. At high temperatures, 1,1,1- Trichlorethane decomposes to give off hydrochloric acid gas plus other toxic and irritating gases as phosgene. If storage containers are exposed to excessive heat, overpressurization of the containers can result. Use water spray to keep fire-exposed containers cool. Pressure demand self-contained breathing apparatus should be provided for firefighters in buildings or confined areas where 1,1,1-Trichloroethane is stored. Extinguishing Media is water spray, dry chemical, carbon dioxide or protein foam.

#### EXPLOSION:

Heated container may rupture and produce flying missiles.

#### HEALTH:

Gas very irritating, if breathed. May cause extreme burning of the eyes resulting in a copius flow of tears. May also cause coughing, difficult breathing and nausea. If exposure is brief, effects last only a few minutes. Effects may be serious if exposed to product in an enclosed unventilated area, or for extended periods of time. Fire may produce irritating or poisonous gases. Runoff from fire control may cause pollution.

# **EVACUATION** (if necessary):

500 Feet (200 Paces) Minimum in all directions. Also, throughout plus half this distance on all sides of any area endangered by smoke and/or vapor cloud.

# IMMEDIATE ACTION INFORMATION

#### GENERAL:

No unnecessary personnel. Self-contained breathing apparatus should be available. Ventilate enclosed areas before entering. Decontaminate all personnel and equipment thoroughly following exposure.

#### FIRE:

On small fires, use water spray, dry chemical, carbon dioxide or protein foam. On large fires, use standard firefighting agents. Keep containers cool. Move containers from hazard if without risk.

#### SPILL:

Stop leak if without risk. Spills should be contained and cleaned up immediately. Large spills should be removed by using a vacuum truck. Smaller spills may be soaked up with compatible absorbent materials which should then be placed in approved containers, labeled, and stored in a safe place out of doors to await proper disposal. The spill area should then be flushed with water. All rinsate should be removed and placed in approved containers to await proper treatment or disposal. Spills on areas other than pavement, e.g., dirt or sand, may be handled by removing the affected soils and placing in approved containers. Persons performing clean-up work should wear adequate personal protective equipment and clothing. Significant spills should be reported to appropriate agencies.

#### FIRST AID:

Remove to fresh air. If breathing has stopped, artificial respiration should be started. Oxygen may be administered, if available. Seek medical attention immediately. Remove contaminated clothing and shoes and wash clothing before reuse. Discard footwear which cannot be decontaminated. In case of contact with material, immediately flush skin or eyes with running water for at least 15 minutes. Eye lids should be held apart to ensure flushing of the entire eye surface. Seek medical attention immediately. A soothing ointment may be applied to irritated skin after cleansing.

# 5.1.3 ACIDS (A-133) - Hydrochloric Acid

#### POTENTIAL HAZARDS

#### FIRE:

Non-flammable in normal state. Flammable and potentially explosive hydrogen gas is generated from reaction with most metals. Hydrogen chloride vapors released normally at ambient, but in increasing amounts at higher temperatures.

#### **EXPLOSION:**

Heated container may rupture violently due to over-pressurization and produce flying missiles.

#### HEALTH:

Vapor, mist, or dust is poisonous if breathed. Contact with material may cause severe burns to skin and eyes. Contaminated water or material runoff may pollute water supply. Runoff to sewer may create poison hazard. Fume and smoke cloud may be extremely toxic.

#### EVACUATION (if necessary):

1,000 Feet (400 Paces) Minimum in all directions. Also, throughout plus half distance on all sides of any area endangered by smoke and/or vapor cloud.

## IMMEDIATE ACTION INFORMATION

#### GENERAL:

No unnecessary personnel. Keep upwind. Identify product and isolate area. Wear self-contained breathing apparatus and full protective clothing and chemical resistant gloves. Special clothing may be required. Refer to MSDS for specific information.

#### FIRE:

On small fires, use dry chemical or carbon dioxide. On large fires, use standard firefighting agents. Move exposed containers from fire area, if without risk. Cool containers with water. If products of combustion or vapor clouds endanger inhabited area, evacuate all regions threatened. Do not get water in container.

#### SPILLS:

Keep people away. Stay upwind. Shut off leak if possible without risk. Try to prevent acid from entering sewers or waterways by diking spilled material with clay or soil. Spilled material should be neutralized with alkali such as soda ash or lime. Do not enter spill area unless equipped with complete protective clothing, including respiratory protection. If runoff cannot be contained, notify downstream health, water, and sanitation districts. Do not get water in containers; violent reaction may occur. If qualified, obtain pH reading; do not attempt to neutralize unless trained. Cover spill with foam or dilute with large amount of water from low pressure streams; watch for reaction and avoid vapor clouds. Dike ahead for later disposal. Decontaminate equipment and personnel following exposure.

#### FIRST AID:

Remove to fresh air promptly. If breathing has stopped, give artificial respiration. If breathing is difficult, give oxygen, provided a qualified operator is available. Get prompt medical attention. If contact with eyes is made, immediately flush with water for 20 to 30 minutes holding eyelids apart. Get medical help. Speed is essential. If contact with skin is made, immediately flush with water, continuing for at least 15 minutes, and remove contaminated clothing and shoes immediately. Get medical help. Keep patient at rest, treat for shock. Effects of contact or inhalation may be delayed. Rescue and ambulance personnel should wear rubber gloves.

# 5.1.4 ACID/OXIDIZER (A-112) - Chromium Trioxide (solid 100 lb drums)

#### POTENTIAL HAZARDS

#### FIRE:

Not flammable but powerful oxidizing agent. May react with organic materials rapidly enough to cause ignition. Avoid contact with Combustibles. Reaction with fuels may be violent.

#### EXPLOSION:

Mixtures with fuels may explode. Very high oxidizers may react vigorously with any combustible material. Container may explode in heat of fire.

#### HEALTH:

Vapor, mist, or dust is poisonous, can be fatal if breathed in high concentrations. Contact with material may cause severe burns to skin and eyes. Contaminated water or material runoff may pollute water supply. Runoff to sewer may create poison and explosion hazard. Smoke cloud may also be toxic.

# EVACUATION (if necessary):

1,500 Feet (600 Paces) Minimum in all directions. Also, throughout plus half distance on all sides of any area endangered by smoke and/or vapor cloud.

#### IMMEDIATE ACTION INFORMATION

#### GENERAL:

No unnecessary personnel. Keep upwind and upgrade. Identify product and isolate hazard area. Wear self-contained breathing appartatus and full protective clothing. Refer to MSDS for specific information.

#### FIRE:

On small fires, use dry chemical, soda ash, or carbon dioxide. On large fires, use water spray or fog. Move exposed containers from fire area, if without risk. Cool containers with water from maximum distance and from behind barrier. Use water spray to protect surrounding area. Flooding amount of water may be required before extinguishment can be accomplished, but do not put stream on any pool of liquid material; watch for reaction. If material reacts vigorously, discontinue application.

#### SPILLS:

Stop leak if without risk. Keep spilled material away from combustibles. Collect small solid spills into clean, dry metal container and keep tightly covered. Use non-combustible absorbent material (sand, etc.) to collect small spills. Dilute liquid spill with large amounts of water using spray or fog

nozzles unless reactive. Adequate ventilation is required for soda ash or limestone due to release of CO<sub>2</sub> gas. Dike for later disposal. If runoff cannot be contained, notify downstream health, water, and sanitation districts. Do not get water inside containers. Decontaminate equipment and personnel following exposure.

#### FIRST AID:

Remove to fresh air. Call a physician and identify product. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Remove contaminated clothing and shoes immediately. In case of contact with material or water solution, immediately flush skin or eyes with running water for at least 15 minutes. Hold eyelids apart to insure complete rinse and get medical attention immediately. Keep patient at rest and treat for shock. Effects of contact or inhalation may be delayed. Rescue and ambulance personnel should wear rubber gloves.

## 5.1.5 CAUSTICS - Magnesium Hydroxide

#### **GENERAL:**

No unnecessary personnel. Keep upwind and upgrade. Identify product and isolate hazard area. Wear self-contained breathing appartatus and full protective clothing. Refer to MSDS for specific information.

#### FIRE:

Non-Flammable

#### EXPLOSION:

Non-Flammable

#### HEALTH:

Causes severe burns to eyes skin and mucous membranes.

# **EVACUATION** (if necessary):

1,500 Feet (600 Paces) Minimum in all directions. Also, throughout plus half distance on all sides of any area endangered by smoke and/or vapor cloud.

## IMMEDIATE ACTION INFORMATION

#### FIRE:

Non-Flammable

#### SPILLS:

If possible, use absorbent, rags or towels to contain the spill but proceed with

extreme caution. Your contaminated clothing and absorbent material should be properly disposed. Wash spill area with soap and water.

#### FIRST AID:

For skin contact: remove all contaminated clothing and flood skin with water. Rinse affected areas with dilute vinegar solution. For eyes: hold eyes open and flush with water. If symptoms persist or develop, seek medical attention.

# PERSONAL PROTECTION:

Avoid contact with the waste and stand upwind. Wear rubber gloves, safety goggles, a half-face respirator with organic vapor cartridges, and other equipment to prevent contact with the body.

# 5.1.6 OXIDIZER/ACID - (A-112) - Chromium Trioxide (solid 100 lb drums)

\* See 5.4.2 Acid/Oxidizer

# SECTION 6. LIST OF EMERGENCY EQUIPMENT AND SPECIFICATIONS

6.1 PERSONNEL SAFETY EQUIPMENT - The following equipment is located in the chrome shop.

#### TABLE 6.1

#### **EQUIPMENT SPECIFICATIONS**

Acid Gas/Organic Vapor
Respirator plus replacement
cartridges

Disposable Suits (such as: Tyvek or Vitron)

**PVC Coated Gloves** 

**PVC/Nitrile Knee Boots** 

Chemical Splash/Impact Goggles

Portable Eye Wash

Absorbent

Sodium Carbonate (soda ash)

Portable Dry Chemical Fire Extinguishers

Protects against 100 ppm vapors by volume or 0.1% 10 ppm chlorine, 50 ppm sulphur dioxide.

Resistant to organic and inorganic acids, caustics, grease and oil PCB's, chlorinated solvents.

Resistant to acids or caustics, grease and oil

Resistant to a broad range of chemicals including acids, oil and grease

Wrap around /snug face fit for protection from hazardous waste contact with eyes during cleanup

Portable, quick mechanism holds 2.5.1 of water or 4 to 6 minutes of spray

Microfibers or polypro-pylene can absorb 9 times its weight in acids, caustics, solvents and oils

Can neutralize acid spills

Class A, B, & C located throughout the facility (see site map)

## 6.2 Fire Extinguishers

Fire extinguishers are to be inspected monthly by the foreman or other designated site personnel. Inadequate pressure reading or damaged extinguishers are to be noted. The noted extinguishers are to be removed and replaced. All fire extinguishers are inspected annually by a qualified fire extinguisher service person. Inspection check list will be maintained on file. Use Form 9.4- Emergency Equipment Inspection Check List.

# 6.3 Safety Shower and Eyewashes

- A. To ensure all safety shower and eyewash stations are operating correctly and damaged or defective parts are replaced to ensure proper operation during an emergency.
- B. To flush the shower and eyewash station to rid rust and dirt buildup.

#### 6.4 First Aid Kit

The first aid kit is inspected monthly according to company policy by Fox First Aid Co., Inc. The kit is OSHA approved. As items are used and the supply depleted, replacements are obtained from Fox First Aid.

# 6.5 Maintenance of Emergency Equipment After Use

All used portable emergency equipment will be cleaned and recharged. Prior to affected system(s) start up, the Emergency Coordinator will ensure that replacement emergency equipment is in place. Site or process operations will not be resumed until all emergency equipment is in place and verified by the inspection checklist. Use Form 9.4.(Emergency Equipment Inspection Check List).

# 6.6 Safety Equipment Locations

Fire extinguisher locations - see facility layout map 10.1. Safety showers and eyewash stations - see facility layout map 10.1. First Aid Box - see facility layout map 10.1. Personal protection equipment is available to site personnel on the site in sufficient quantity to serve the needs of all employees, with stock maintained in adequate supply to ensure that all equipment can be exchanged if needed.

# SECTION 7. POST RESPONSE ACTIVITIES

After the emergency situation is contained/controlled, the facility supervisor or his designee will immediately provide for treating, storing or disposing of recovered waste, contaminated soil or surface water or any other material that results from a release, fire or explosion at the facility. (For example, contaminated absorbent pads or soil will be drummed and stored prior to appropriate disposal).

The facility supervisor will ensure that no waste that may be incompatible with the released material is treated, stored or disposed of until clean-up procedures are completed.

The facility supervisor will ensure that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

The facility supervisor or his designee will notify the Department of Health Services and appropriate state and local authorities that the facility is in compliance with the above conditions before operations are resumed in the affected area(s) of the facility.

# SECTION 8. PROVISION FOR AMENDMENTS

This Contingency Plan shall be reviewed annually or appropriately amended as a result of the following situations:

- 1. The facility operations change such that the potential for fires, explosions and/or releases of hazardous wastes is altered.
- 2. The facility permit is revised.
- 3. Review after an emergency shows an alternative or improved method of control and/or prevention of the incident.
- 4. The Contingency Plan fails or is deficient in an emergency.
- The list of Emergency Coordinators changes.
- 6. The list of Emergency equipment changes.

The intention is to have a fully up-to-date and functional plan to deal with any emergency. The facility supervisor is responsible for amending the plan. Whenever the plan is substantially amended, copies of the amendments will be submitted to all outside agencies having a copy of the plan and written confirmation of receipt of the amendments will be required.

# 9.1 EMERGENCY EVENT REPORTING FORM (ON SITE)

ELECTRONIC CHROME & GRINDING CO. 9128-32 Dice Road	E	PA ID #: CAD 008 391 42
Santa Fe Springs, CA 90670		
Name and telephone number of person reporting:  Time/Date of incident:  Type of incident:  Material(s) Involved and Quantity:		
Extent of injuries:		
The release will affect human health or the environment If YES, describe:		NO
Corrective action taken to contain release:		
Estimated quantity and disposal of recovered material free Hazardous Waste Manifest No.:	rom incid	
TABLE TO THE PROPERTY OF THE P	(11 ap	opiicable)
LOCAL AUTHORITIES PROVIDING EMERGENCY ASSIST	TANCE (S	SECTION 4.1)
Fire Department		(310) 944-9713
Paramedics	911	
Police Department	911	(310) 863-8711
Office of Emergency Services		(800) 852-7550
		(916) 427-4341
HOSPITALS AND MEDICAL CLINICS:		
Slauson-Sorenson Medical Clinic		(310) 696-1161
Presbyterian Inter-Community Hospital		(310) 698-0811
State California Environmental Protection Agend		
Dept. of Toxic Substance Control Program -R	cy Porton 2	(919) 5/7 2000
Dopt. of Toxic Substance Control Flogram -	region 3	(818) 567-3000
County of Los Angeles Fire Department Fire Pre	evention.	
Preparedness and Conservation Bureau	<b></b>	(213) 744-5316
California Chemical Disnosal		(213) 834_8077
<b>F</b>		
California Chemical Disposal		(213) 834-8077 (800) 828-4455

## 9.2 EMERGENCY EVENT REPORTING FORM (OFF SITE)

ELECTRONIC CHROME & GRINDING CO. EPA ID #: CAD 008 391 427 9128-32 Dice Road, Santa Fe Springs, CA 90670 Name and telephone number of person reporting: Time/Date of incident: Type of incident: Material(s) Involved and Quantity: Extent of injuries: The release will affect human health or the environment: YES \_\_\_\_\_\_NO \_\_\_\_ If YES, describe: Corrective action taken to contain release: Estimated quantity and disposal of recovered material from incident: Hazardous Waste Manifest No.: \_\_\_\_ (if applicable) CALL AGENCIES BELOW (TABLE 4.2): Telephone Number: California Environmental Protection Agency (Region 3) Dept. of Toxic Substances Control 1405 N. San Fernando Blvd., Burbank, CA 91504 (818) 567-3000 County of Los Angeles Fire Department, Fire Prevention, Preparedness and Conservation Bureau Hazardous Materials Control Program 2615 South Grand Avenue, Los Angeles, CA 90007-2668 (213) 744-5316 U.S. EPA, Toxic Spills Division T-3-3 215 Fremont Street, San Francisco, CA 94105 (415) 974-8131 Regional Water Quality Control Board 101 Centre Plaza Drive, Monterey Park, CA 91754-2156 (213) 266-7500 EMERGENCY RESPONSE 911 OFFICE OF EMERGENCY SERVICES (800) 852-7550 or (916) 427-4341 NATIONAL RESPONSE CENTER (800) 424-8802 Department of Transportation (202) 426-1830 California Chemical Disposal (213) 834-8077 or (800) 828-4455

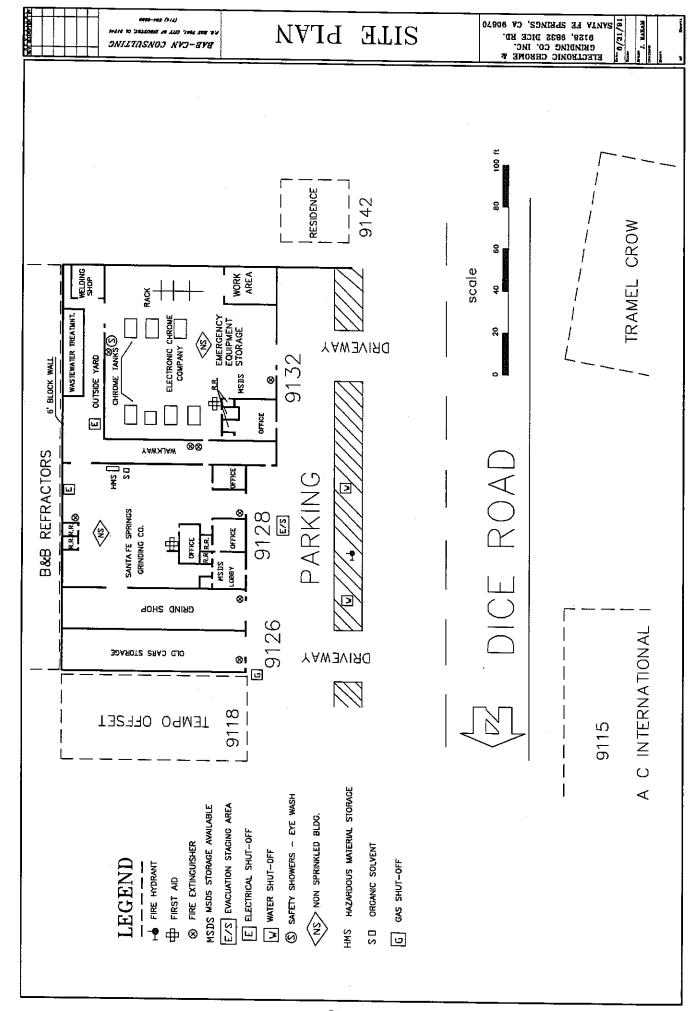
# 9.3.1 PREVENTION OF RECURRENCE - INSPECTION FORM

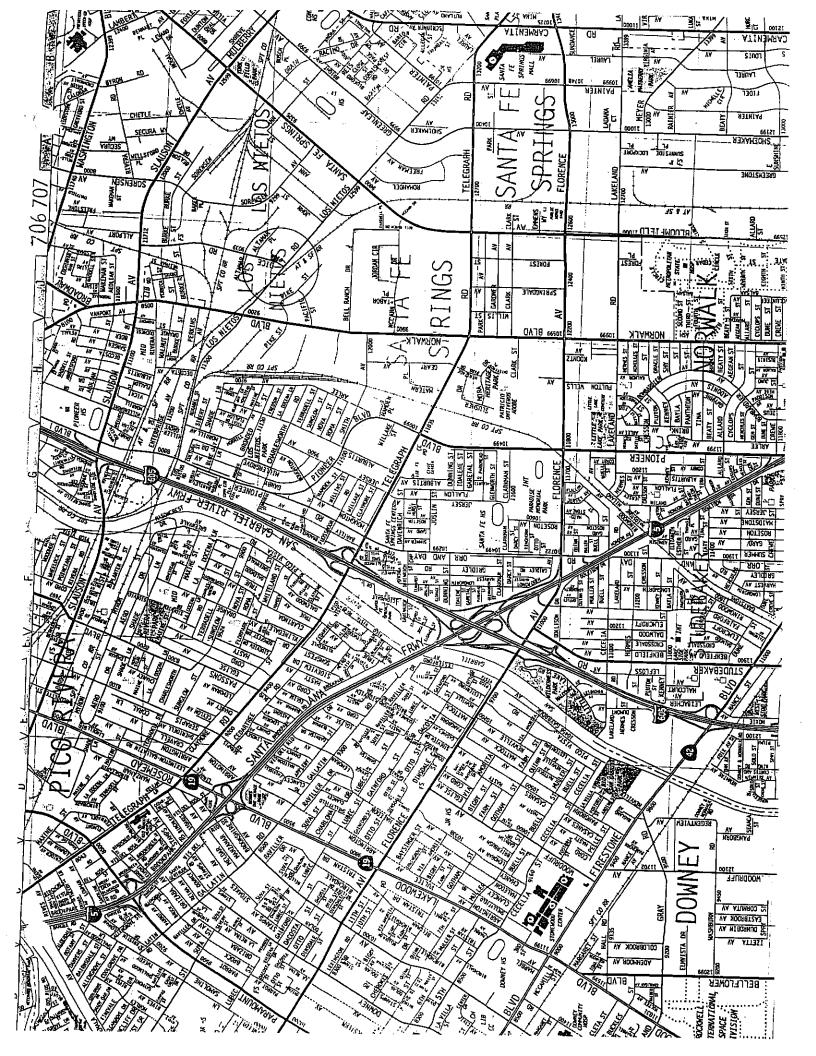
The following items shall be checked after any major Act of God (earthquakes, floods, storms, etc.)

NA	AME OF INSPECTOR:	DATE:	
1.	Tanks or containment vessels:		
2.	All equipment, safety guards, alarms, etc.:		· ·
3.	Pumping units, pipes, valves, etc.:		
4.	Gas leaks, valves, pipes, etc.:		
5.	Electrical panels, electrical lines,poles,etc.:		, , , , , , , , , , , , , , , , , , ,
6.	Water leaks, valves, pipes, pure, etc.:		
7.	Waste storage area and containers:		
8.	Buildings, fences:		
9.			
Ad	ditional Comments (attach additional pages as requ		
			•

# FORM 9.4 - EMERGENCY EQUIPMENT INSPECTION CHECK LIST

	Check if OK	Recommendations
Fire Extinguishers		
Fire Hoses		
Safety showers & eyewash stations		
Acid gas/organic vapor respirator plus replacement cartridges		
Disposable suits	· · · · · · · · · · · · · · · · · · ·	·
PVC coated gloves		
PVC/nitrite knee boots		
Chemical splash/impact goggles		
Portable eyewash	<del></del>	·
Absorbent		
Sodium carbonate (soda ash)		
Portable dry chemical fire extinguishers, Class A.B.C.		





# FORM 11.1 CONTINGENCY PLAN MANUAL DISTRIBUTION

DATE PRESENTED OR MAILED	RECEIVED BY (NAME)	FACILITY NAME & ADDRESS
		City of Santa Fe Springs Fire Dept. 11300 Greenstone Avenue Santa Fe Springs, CA 90670
· ·	· · · · · · · · · · · · · · · · · · ·	Norwalk Sheriff Station 12335 Civic Center Drive Norwalk, CA 90650
		Slauson-Sorenson Medical Clinic 11823 E. Slauson Ave., Unit 40 Santa Fe Springs, CA 90670
		Presbyterian Inter-Community Hospital 12401 E. Washington Blvd. Whittier, CA 90606
		County of Los Angeles Fire Dept. Fire Prevention, Preparedness and Conservation Bureau 2615 South Grand Ave. Los Angeles, CA 90007-2668
		California Chemical Disposal 1815 East O Street Wilmington, CA 90744

# CONTINGENCY PLAN & EMERGENCY PROCEDURES

#### TITLE 22, SECTION 67126

# ARRANGEMENTS WITH LOCAL AUTHORITIES

Electronic Chrome & Grinding has attempted to make the following arrangements, as appropriate, for the type of wastes handled at this facility and the potential need for services. Our Contingency Plan contains the appropriate information required, to familiarize the Slauson-Sorenson Medical Clinic with the layout of the facility, properties of the hazardous waste handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to the facility, and possible evacuation routes. These areas have been covered within the contents of this Contingency Plan.

This Plan specifically covers:		
Company Name:	Electronic Chrome & Grinding Co.	
Street:	9128-32 Dice Road	
City/State/Zip:	Santa Fe Springs, CA 90670	
Emergency Coordinator:	Mike Reed	
Telephone No.:	BUS. 310-946-6671 RES. FX-6: Personal Privacy	
Received on behalf of:	Slauson-Sorenson Medical Clinic 11823 E. Slauson Ave., Suite 40 Santa Fe Springs, CA 90670 Telephone No.: (310) 696-1161	
Received By:	Dated:/_ /	
Printed Signature:		

# CONTINGENCY PLAN TRAINING PROGRAM

# **ELECTRONIC CHROME & GRINDING CO., INC.**

9128-32 DICE ROAD SANTA FE SPRINGS, CA 90670

(310) 946-6671

#### ELECTRONIC CHROME & GRINDING CO. 9128-32 DICE ROAD SANTA FE SPRINGS, CALIFORNIA 90670

# ON THE JOB TRAINING PROGRAM

We have an on-the-job training program (OJT) for the training of Electronic Chrome personnel to handle hazardous materials and wastes encountered during their every day duties. Along with the OJT, a general overview of the regulations is reviewed, as well as an indepth session on the Contingency Plan and Emergency Preparedness.

#### OVERVIEW OF THE HAZARDOUS MATERIALS/WASTES TRAINING

#### Section I Introduction

Employees are introduced to the general concepts behind the RCRA permitting process and RCRA requirements. It outlines the authority regulating hazardous wastes under RCRA, the purpose of the act and its effect on Electronic Chrome.

#### Section 2 Process Description

Focus is on specific activities that are necessary to comply with RCRA. It begins with a site description, continues with waste classifications, analysis, hazards and hazards management, including personal protective equipment and concludes with scheduled site inspections.

# Section 3 Emergency Procedures and Contingency Plan

Detailed instructions are provided on the steps to be taken in the event of an emergency such as fires and material spills. The Emergency Coordinator is clearly identified, as are emergency telephone numbers and directions for locating and using onsite emergency equipment and communications.

#### Section 4 Annual Review

The importance of annual review is described for the purpose of self-improvement of the site. The review is intended to revise and/or amend operations according to experience. The hazardous materials and waste training manual will involve approximately 8 hours of training. The annual review is anticipated to take one day. All site personnel will receive this instruction. Personnel maintains records of all formal training courses given by the company to its employees.

#### INTERNAL TRAINING

Hazards and Protection (H & P)

Any employee who works in a potentially hazardous environment must have comprehensive training enabling him to perform safely as well as efficiently. The H & P course is "basic training".

The following subjects are reviewed:

- Safe work practices
- Flammable atmospheres and ignition controls
- Protective clothing
- Test, inspections and paperwork
- Air purifying respirators
- Heat stress hazards
- Material Safety Data Sheets

First Aid (FA) and CPR

These courses are normally arranged through local Red Cross, Heart Association, Safety Council, Fire Department, etc.

#### TRAINING DIRECTORS

The Training Directors are the Emergency Coordinators or his designee. These individuals are familiar with worker safety requirements and hazardous materials and waste regulations. Additional expertise will be employed as required to cover specialized areas of the training program. Updates of this program will be performed as required.

# RELEVANCE OF TRAINING TO JOB POSITION

All employees and management personnel will undergo the hazardous materials/wastes training outlined above so that they will be familiar with all aspects of site operations. Some aspects of this training will be emphasized for certain positions. For example, record keeping and its importance will be emphasized for the foreman. Safe and proper equipment operation will be stressed for the operators, as will personal protective equipment and its use and limitations.

#### TRAINING FOR EMERGENCY RESPONSE

This training program is designed to ensure that personnel not only handles hazardous materials and waste in a safe manner but also properly respond to emergency situations. This program trains personnel to maintain compliance under both normal operating conditions and emergency situations. Emergency response is discussed in the Contingency Plan.

Training elements addressing non-routine and emergency situations (unscheduled events such as fires, spills, etc.) include:

- 1. Procedures for locating, using, inspecting, preparing and replacing emergency equipment.
- 2. Emergency communications procedures and alarm system.
- 3. Response to fire, explosions, spills and materials release.
- 4. Shut down of operations.
- 5. Procedures for evacuation.

Details of these elements are to be found in the Contingency Plan.

#### **IMPLEMENTATION**

The manual will be implemented under the direction of the Emergency Coordinator. In the future, all new personnel will complete this training within six months of their date of employment. No employee will be allowed to work unsupervised prior to completion of the training program.

Employees will be required to meet annually for review and update of this training program and to discuss and study the following subjects:

- 1. All hazardous wastes currently being handled at the facility, noting any changes in waste type, volume source, characteristics or location that have occurred during the past year.
- 2. The status of operating conditions and procedures, noting any areas where there are problems or potential for problems. Employees will be invited to participate in developing effective solutions.
- 3. The requirements contained in the facility's permits, noting any changes that have occurred during the past year.
- 4. Incidents that have occurred during the past year that warranted the use of Contingency Plans and/or emergency action. This review focuses on the cause of the incident and identification of steps to be taken to ensure better handling of such events in the future.

Records documenting the job title for each position, job descriptions, name of employees and completed training programs (introductory and review) will be kept in the personnel files. These current records will be kept until closure of the facility for current employees and for three years from the date of the employee's termination for former employees.

## TRAINING OUTLINE FOR HAZARDOUS MATERIALS & WASTES

(Note: This is a training agenda document and not an index for the following pages).

#### 1. Introduction

- 1.1 Overview of RCRA and its purpose
- 1.2 Chemical hazards (toxicity, reactivity, corrosivity, ignitability)

#### \* Refer directly to the Contingency Plan for the following:

- 2. Process Description
  - 2.1 Site description
  - 2.2 Waste classification
  - 2.3 Waste to be managed (which are unacceptable, etc.)
  - 2.4 Waste analysis normal/routine operations (proper handling, etc., job titles and roles)
  - 2.5 Hazards involved in routine operations.
  - 2.6 Management of 2.5 (protective equipment, safe operating procedures,
  - etc.)
  - 2.7 Record keeping and reporting
  - 2.8 Site security (if appropriate)
  - 2.9 Inspections

#### 3. Emergency Procedures and Contingency Plan

- 3.1 Emergency coordinator
- 3.2 Emergency procedures (evaluations)
- 3.3 Emergency communications
- 3.4 Emergency equipment (location, maintenance, use, etc.)
- 3.5 Spill control
- 3.6 Fires and explosives
- 3.7 Weather (flooding, etc.)
- 3.8 Drills (Practice at least quarterly to start)

#### 4. Annual Review

- 4.1 Annual review meetings
- 4.2 Status of site operations/problem area and solutions
- 4.3 Changes in the law
- 4.4 Incidence of contingencies discussion of causes, effects and means of prevention
- 4.5 Discussion of drill procedures and effectiveness, improvements, etc.

#### 1.1 Overview of RCRA and its purpose:

The Resource Conservation and Recovery Act (RCRA), an Amendment to the Solid Waste Disposal Act of 1965, was passed in 1976 to address a problem of enormous magnitude - How to safely dispose of huge volumes of municipal and industrial solid waste generated nationwide. Unfortunately, phenomenal growth in the production of waste was not mirrored by growth in the field of waste management. Much of the waste produced made its way into the environment where it poses a serious threat to ecological systems and public health. It become clear, in the mid-1970's to Congress and the nation alike, that action had to be taken to assure that solid wastes are managed properly. This action resulted in the establishment of RCRA. The goals set by RCRA are:

- 1. To protect human health and the environment
- 2. To reduce waste and conserve energy and natural resources
- 3. To reduce or eliminate the generation of hazardous waste as expeditiously as possible

To achieve these goals, three distinct yet interrelated programs were developed under RCRA:

- Subtitle D encourages states to develop comprehensive plans for the management of solid wastes, primarily non-hazardous, eg: household waste
- Subtitle C establishes a system for controlling hazardous waste from the time it is generated until its ultimate disposal, in effect, from "cradle to grave".
- Subtitle I A new program established by the Hazardous and Solid Waste Amendments of 1984 (HSWA), that regulates certain underground storage tanks and require leak detection, prevention and correction at underground tank sites.

#### There are several pieces to RCRA:

#### ACT

Describes in statutory language the kind of waste management program that Congress wants to establish. The Act also provides the Administrator of EPA (or his designee) with the authority to implement the Act.

#### Regulations

Mandated by Congress and developed by EPA, Regulations are the legal mechanism that spell out how the Act's directives are to be carried out. Regulations are published in the Federal Register and codified in the Code of Federal Regulations (CFR).

#### Guidance

Developed and issued by EPA (or the States) to provide instructions on how to implement parts of either the Act or regulations.

#### Policy

Statements developed by EPA (or the States) outlining a position on a topic or giving instructions on how a procedure <u>must</u> be conducted.

NOTE: The definition of Solid Waste - in understanding the RCRA definition of solid waste, it is important to keep in mind that all solid waste is NOT solid. Many solid wastes are liquid, while others are semi-solid or gaseous. Additional information follows in Section 1.2.

- 1.2 Chemical Hazards (toxicity, reactivity, corrosivity, ignitability) Congress defined the term "hazardous waste" in Section 1004(5) of RCRA as a "solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may:
  - A. cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or
  - B. pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed."

EPA developed the regulatory framework that would identify those solid wastes that must be managed as hazardous wastes under Subtitle C. This framework (40 CFR Part 261), specifies that a solid waste is hazardous if it meets one of four conditions:

- 1. Has been named as a hazardous waste and listed.
- 2. Is a <u>mixture</u> containing a listed hazardous waste and a non-hazardous solid waste (unless the mixture is specifically excluded or no longer exhibits any of the characteristics of hazardous waste).
- 3. Is not excluded from regulations as a hazardous waste.
- 4. Exhibits, on analysis, any of the <u>characteristics</u> of a hazardous waste. EPA has identified four characteristics for hazardous waste. Any solid waste that exhibits one or more of them is classified as hazardous under RCRA. The characteristics are:
- IGNITABILITY
- CORROSIVITY
- REACTIVITY
- EP TOXICITY NOW REPLACED BY TCLP
  - Toxicity Characteristic Leaching Procedure

The Hazardous Waste and Solid Waste Amendments (HSWA) of 1984 required the U.S. Environmental Protection Agency to review and modify the EP Toxicity test for determining hazardous waste toxicity.

As a result of this review, EPA promulgated the Toxicity Characteristic rule, which requires a more stringent test for toxicity: the Toxicity Characteristic Leaching Procedure (TCLP). The change is estimated to have effected nearly 20,000 facilities nationwide, including a large number of newly-regulated waste generators. The Toxicity Characteristic Leaching Procedure tests waste for the characteristic of toxicity (the potential to leach significant concentrations of one or more of the 39 toxic constituents - D004 to D043). It replaces the Extraction Procedure Toxicity (EP Toxic) test for determining leaching potential of a waste. For example, if the extract of a waste contains chromium above 5.0 mg/l. the waste exhibits the toxicity characteristic (TC) for chromium, or D007.

The TCLP test expands the parameters for classifying hazardous wastes by covering a total of 39 chemical constituents, while the EP Toxic test covered only 14. The TCLP considers 18 volatile organic compounds as well as semi-volatile organic compounds. These were not addressed with the EP Toxic test. While the TCLP does not set more stringent concentration limits, it is more rigid than the EP Toxic

test from a management standpoint because it covers more constituents than the EP Toxic test. Because the TCLP is a more aggressive test, wastes which passed the EP Toxic test may fail the TCLP.

#### Does the TCLP impact used oil regulations?

Used oil that is disposed of rather than recycled or recovered for energy is regulated as a hazardous waste under Subtitle C if it exhibits any of the four characteristics of a hazardous waste. The Toxicity Characteristic rule brings many previously nonhazardous used oil substances under Subtitle C regulation. The new rule does not affect existing regulations for recycled oil.